• Please type your name, entity/publisher being represented, and contact email in the chat or email NASA Software Attestation POCs via Agency-DL-SoftwareAttestation@mail.nasa.gov

• Collaboration Opportunities are intended to establish bi-directional communications regarding the self-attestation collection process and answer or clarify any questions from our supplier/contractor & publisher community.

• Unless there are objections, sessions will be recorded
The Federal Information Security Modernization Act of 2014 (FISMA) requires each Federal agency to provide security protections for both “information collected or maintained by or on behalf of an agency” and for “information systems used or operated by an agency or by a contractor of an agency or other organization on behalf of an agency.”

Consistent with these authorities and the directives of EO 14028, each Federal agency is required to comply with the NIST Guidance when using third-party software on the agency’s information systems or otherwise affecting the agency’s information.

We do anticipate a future contract requirement that is linked to Open Federal Acquisition Regulation (FAR) Case 2023-002 affecting Parts 1, 39, 52.
Agenda

• Clarification – Software Developed By or on Behalf of NASA & Commercially Acquired
• Navigating [CISAs Repository for Attestations and Artifacts (RSAA)](https://cisas.reposit)ry.com), a Software Publisher’s Perspective
• Attestation Alternatives
• Question & Answer
Self Attestation: In-House / Contracted Service (Out of Scope)

Attestation Required

Software used for development

Attestation Not Req.

Software developed by or on behalf of NASA

NOTE: NPR 7150 should be followed for development within the NASA environment
Self Attestation: Commercial Acquisitions (In Scope)

1. Customer Commercial IT Request (CITR)
2. IT Acquisition Dependencies (NF1707 Checks)
3. ICT/C-SCRM (SCRAs)
4. Checks RSAA
5. Commercial Software product with noted presence of attestation & association with NASA in RSAA, or not, added to CAP
Repository for Software Attestations and Artifacts

Privacy Notice

You are accessing a U.S. Government information system, which includes (1) this computer, (2) this computer network, (3) all computers connected to this network and (4) all devices and storage media attached to this network or to a computer on this network. This information system is provided for U.S. Government-authorized use only. Unauthorized or improper use or access of this system may result in disciplinary action, as well as civil and criminal penalties.

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- You have no reasonable expectation of privacy when you use this information system; this includes any communications or data transiting, stored on or traveling to or from this information system.
- At any time, and for any lawful government purpose, the government may monitor, intercept, search and seize any communication or data transiting, stored on or traveling to or from this information system.
- The government may disclose or use any communications or data transiting, stored on or traveling to or from this information system for any lawful government purpose.

You are NOT authorized to access classified information on this information system.
BUSINESS CYBER GUARDIAN™:
A Software Engineering Company dedicated to software supply chain cyber-risk detection solutions for companies, and Active Member of the CISA ICT_SCRM Task Force Software Assurance Workgroup

Attestation Collection:
A Software Publishers Perspective

Dick Brooks, Lead Software Engineer
dick@businesscyberguardian.com
Agenda

• BCG background
• CISA’s Secure Software Attestation Form Expectations and RSAA Portal
• Guidance and Lessons Learned
Software Engineering Company in Westfield, MA providing ICT_SCRM products and services to illuminate cyber-risks and verify products against the “CISA Common Form” requirements for both producers and consumers of software products

- Contributor to CISA Software Acquisition Guide
- Information and Communications Technology Supply Chain Risk Management (SCRM) Task Force Member
- Critical Manufacturing Sector Coordinating Council (CMSCC) Information Technology Subject Matter Expert
- Adviser to Healthcare Sector Coordinating Council

What does BCG do?
BCG Products and Services

• **Software Assurance Guardian Point Man (SAG-PM™)**
  - Cyber-risk illumination tool to verify products for NIST Guidance in OMB-M-22-18 and the CISA Buyers Guide recommendations
    - SEC Cybersecurity Disclosure Regulations (17 CFR 229.106)
    - FDA Vulnerability Disclosure Reporting for MDM
    - Executive Order 14028 and OMB M-22-18 compliance
    - GSA SCRIPTS RFQ BPA “ready”

• **Software Assurance Guardian Community Trust Registry (SAG-CTR™)**
  - Cloud based verification and cyber-risk reporting service using SAG-PM
  - CISA Common Form verification services
  - Enables parties to register trust in software products and share findings with other agencies
    - Supports Internet Engineering Task Force (IETF) Supply Chain Integrity, Transparency and Trust (SCITT) concept listing trusted products (Cloud Service, running on AWS)
CISA’s Secure Software Attestation Form

- **Authority:** Governing laws including 44 U.S.C. § 3554, E.O.14028, and OMB Memorandum M-22-18

- **Conditions for Self-Attestation:** Software development date or significant version changes after specified dates

- **Exclusions from Self-Attestation:** Federal agency-developed software, freely obtained/open-source software, and certain third-party components

- **Submission Instructions:** Online form via provided URL or PDF submission with specific naming convention

- **Form Completion:** Requires description of software and producer info; CEO or designee signature necessary

- **Third-Party Assessment Option:** Performed by a certified or approved Third Party Assessor Organization
CISA’s Forthcoming Buyer’s Guide

• Key artifact with description of detailed Secure by Design requirements
• A “how-to” manual for Secure by Design
• Identifies management of required information to customers
  • Organize, prepare and communicate
• IETF SCITT Vendor Response Form
  • Enables software consumers to retrieve information from a known trusted source
  • Supports US Cyber Trust Mark
  • Demo’d at IETF 117 Hackathon
## Software Record

Software Assurance Guardian Point Man (SAG-PM), 1.2.2-1.2.2 [Released 12/15/2023]

### Software Producer

**Reliable Energy Analytics**  
23 Linda Dr, Westfield, MA 01085, USA  
Website: [https://reliableenergyanalytics.com/](https://reliableenergyanalytics.com/)

### Contact

**Dick Brooks**  
Co-Founder  
Tel: No Data  
Email: dick@reliableenergyanalytics.com

### Agency Statuses

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Non-Valid
Attestations

(SAG-PM) v1.2.2 Secure Software Attestation Form - Requires POA&M

Software Producer: Reliable Energy Analytic
Attended By: Uploaded Attestation

Created by Dick Brooks on 04/03/2024, 08:30:31 AM EDT

Artifacts

2024-04-13 POA&M for NASA using DoD format in Excel

Description: No data
Type: Plan of Action and Milestones

File: SAG-PM-V1-2-2-POA&M-2024-0408.xls

Created by Dick Brooks on 04/13/2024, 08:50:20 AM EDT
SAG-CTR Demonstration: Sharing Results

SAG-CTR APIs are available for easy integration into other dashboard products and websites, such as app stores:

- https://softwareassuranceguardian.com/SAGCTR/
- https://softwareassuranceguardian.com/SAGCTR_inquiry/getProductCategories
- https://softwareassuranceguardian.com/SAGCTR_inquiry/getLabelTypes
- https://softwareassuranceguardian.com/SAGCTR_inquiry/getSAGScore?FileHash=48E0EEB4C538BDC65514D68DDA5E1B41BE9F38AAB3A9B4108F056A27BE1F379A
Lessons Learned

• Software Suppliers need to apply for an RSAA account; can take a few days to complete
  • An authenticator app is needed for MFA (REA uses the Google App)
• Only one artifact is required: A Fully Executed CISA Secure Software Attestation Form
• Attestation form can represent a single product or an entire product line; REA submitted a “product attestation”
• Agencies may also request other artifacts, such as an SBOM and Vulnerability Disclosure Report (VDR) see Buyers Guide for details
• Software Suppliers should prepare by organizing all of the artifacts using a Vendor Response Form (VRF document) – not required, but useful for keeping a “RSAA submission package organized”. BCG submitted its VRF package as an artifact in RSAA.
• BCG anticipated having to supply all of the required and optional artifacts and prepared by uploading all artifacts to RSAA as a package
  • Artifact uploads can be slow to process – over a minute to accept/reject
Lessons Learned

- Artifacts need to be “Attached” to an Attestation (separate step)
- Attestations need to be “Attached” to a software record (separate step)
- Attestations need to be “Associated” with an Agency/Department in RSAA
- There are some open questions about using RSAA to indicate that an attestation requires a POA&M (will be addressed in Buyers Guide FAQ)
- Recommend that Software Suppliers use the Buyers Guide Spreadsheet for the best chance at “passing the attestation test”, based on the Buyers Guide materials.
- Consider the benefits of sharing RSAA processing results with other agencies using a “Trust Registry”, like IETF SCITT
- It’s in a suppliers best interest to provide information up front, in the RSAA portal, to avoid back-forth on items the “Common Form” doesn’t address, like foreign ownership and influence (FOCI)
Questions?

Thank You
Dick Brooks
dick@businesscyberguardian.com
Attestation Alternatives

• FedRAMP Third Party Assessment Organization (3PAO)
• Certification / Authorization Types
  ✓ FedRAMP Authorization
  ✓ National Institute of Standard & Technology (NIST) – 800-53 or 800-171
  ✓ Capability Maturity Model Integration (CMMI)
Resources

- NASA Knowledge Center (internal) – https://nasa.sharepoint.com/sites/ictscrm/SitePages/SCRM-Knowledge-Center(1).aspx
- RSAA - https://softwaresecurity.cisa.gov/login
- Executive Order 14028 - https://www.whitehouse.gov/briefing-room/presidential-actions/2021/05/12/executive-order-on-improving-the-nations-cybersecurity/
Questions?

Kanitra D. Tyler
CISSP, CAP, CEH, NSA IAM/IEM, CHFI, CECS, ITIL v3
ICT/Cyber Supply Chain Risk Management (SCRM) Service
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