

# Challenges and Opportunities in Implementing a Security Development Lifecycle

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imagination at work

GE  
Digital Energy

# Overview

The problem

Change is hard

Where do we go from here

Four initial focus areas

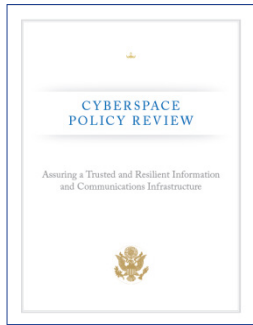
Other important needs

Measuring progress

Market drivers

Regulatory drivers

# Current Landscape



NIST

CPNI  
Center for the Protection  
of National Infrastructure

ISA  
NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

## Customer and regulatory requirements

- NERC CIP Reliability Standards, ISA99
- Department of Homeland Security: Cyber Security Procurement Language for Control Systems
- **Impact:** Increased development cost, potential revenue loss

## Targeted cyber attacks & media interest

- Stuxnet malware targeting Siemens WinCC SCADA systems
- Security researcher interest in control systems security
- “Advanced Persistent Threat” & Google “Aurora” attacks
- **Impact:** Potential for litigation or reputational/brand injury

## Product security certification & marketing

- Microsoft Trustworthy Computing and SDL
- Emerging cyber security certifications (ex. Wurdtech Achilles, ISASecure, SEI CERT SCALE)
- **Impact:** Security as a competitive factor





**The Air Gap is gone...**

**We can no longer rely on network defenses**

**Inter-connection IS the key in Smart Grid**

**Application Security is absolutely critical!**

# Why transformational efforts fail

Stage	Action Needed	Pitfalls
Establish a sense of urgency	<ul style="list-style-type: none"> <li>Examine market and competitive realities for potential crises and untapped opportunities.</li> <li>Convince at least 75% of your managers that the status quo is more dangerous than the unknown.</li> </ul>	<ul style="list-style-type: none"> <li>Underestimating the difficulty of driving people from their comfort zones</li> <li>Becoming paralyzed by risks</li> </ul>
Form a powerful guiding coalition	<ul style="list-style-type: none"> <li>Assemble a group with shared commitment and enough power to lead the change effort.</li> <li>Encourage them to work as a team outside the normal hierarchy.</li> </ul>	<ul style="list-style-type: none"> <li>No prior experience in teamwork at the top</li> <li>Relegating team leadership to an HR, quality, or strategic planning executive rather than a senior line manager</li> </ul>
Create a vision	<ul style="list-style-type: none"> <li>Create a vision to direct the change effort.</li> <li>Develop strategies for realizing that vision.</li> </ul>	<ul style="list-style-type: none"> <li>Presenting a vision that's too complicated or vague to be communicated in five minutes</li> </ul>
Communicate the vision	<ul style="list-style-type: none"> <li>Use every vehicle possible to communicate the new vision and strategies for achieving it.</li> <li>Teach new behaviors by the example of the guiding coalition.</li> </ul>	<ul style="list-style-type: none"> <li>Undercommunicating the vision</li> <li>Behaving in ways antithetical to the vision</li> </ul>

# Why transformational efforts fail (Continued)

Stage	Action Needed	Pitfalls
Empower others to act on the vision	<ul style="list-style-type: none"> <li>Remove or alter systems or structures undermining the vision.</li> <li>Encourage risk taking and nontraditional ideas, activities, and actions</li> </ul>	<ul style="list-style-type: none"> <li>Failing to remove powerful individuals who resist the change effort</li> </ul>
Plan for and create short-term wins	<ul style="list-style-type: none"> <li>Define and engineer visible performance improvements.</li> <li>Recognize and reward employees contributing to those improvements.</li> </ul>	<ul style="list-style-type: none"> <li>Leaving short-term successes up to chance</li> <li>Failing to score successes early enough (12-24 months into the change effort)</li> </ul>
Consolidate improvements and produce more change	<ul style="list-style-type: none"> <li>Use increased credibility from early wins to change systems, structures, and policies undermining the vision.</li> <li>Hire, promote, and develop employees who can implement the vision.</li> <li>Reinvigorate the change process with new projects and change agents</li> </ul>	<ul style="list-style-type: none"> <li>Declaring victory too soon with the first performance improvement</li> <li>Allowing resisters to convince “troops” that the war has been won</li> </ul>
Institutionalize new approaches	<ul style="list-style-type: none"> <li>Articulate connections between new behaviors and corporate success.</li> <li>Create leadership development and succession plans consistent with the new approach</li> </ul>	<ul style="list-style-type: none"> <li>Not creating new social norms and shared values consistent with changes</li> <li>Promoting people into leadership positions who don’t personify the new Approach</li> </ul>



“When is the urgency rate high enough?”

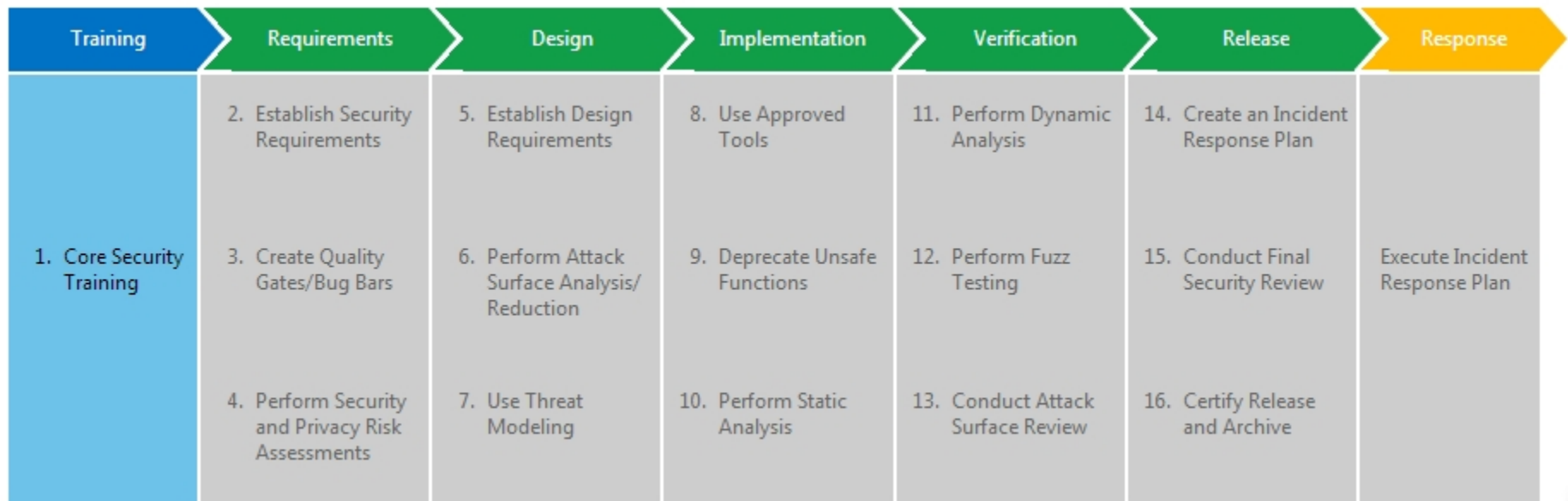
From what I have seen, the answer is when about 75% of a company’s management is honestly convinced that business as usual is totally unacceptable.”

- John P. Kotter, *Leading Change: Why Transformational Efforts Fail*

# Microsoft Security Development Lifecycle

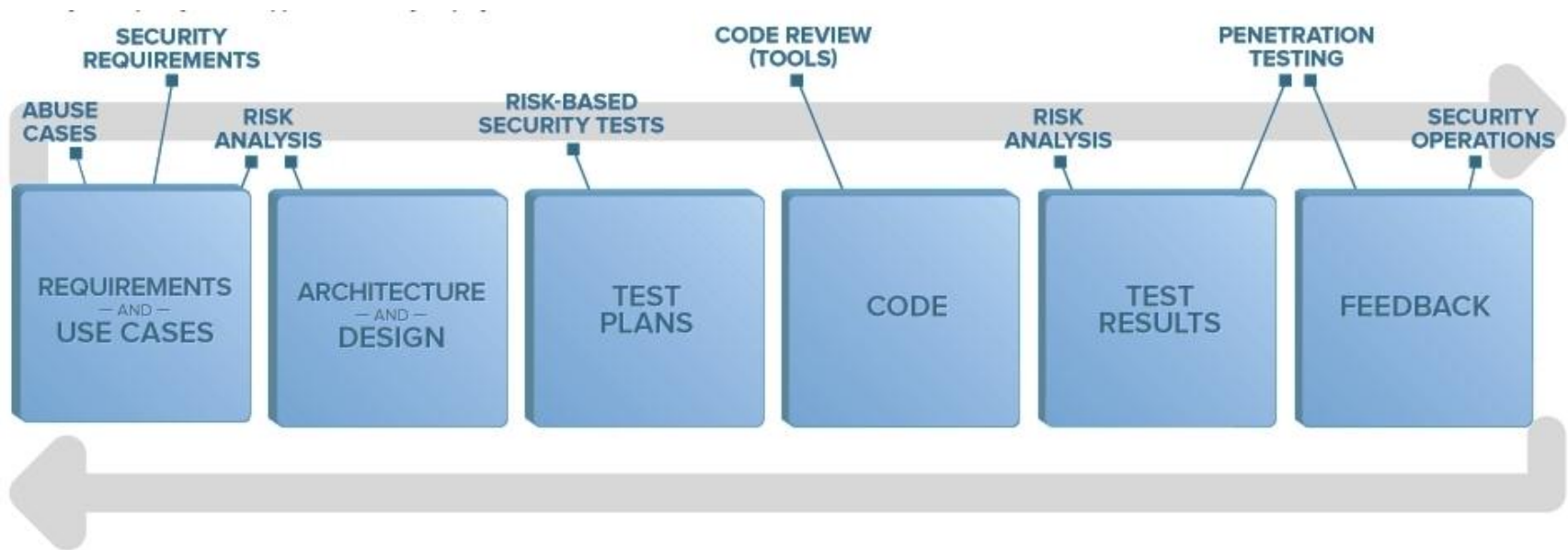
Huge investment in security after 2002 Trustworthy Computing memo

Very focused on the way Microsoft develops products



# Digital Security Touchpoints

## Development methodology agnostic



# What direction were we going to take?

Challenge – Disparate develop methods, varying Agile process maturity

Opportunity – Widespread support from senior management on down



# Software security maturity models

	<b>Building Security In Maturity Model (BSIMM)</b>	<b>Software Assurance Maturity Model (OpenSAMM)</b>
<b>Background</b>	<p>BSIMM is a real-world set of software security activities organized so that you can determine where you stand with your software security initiative and how to evolve your initiative over time.</p> <p>Authored by Gary McGraw, Sammy Miguez, &amp; Jacob West</p>	<p>The Software Assurance Maturity Model (SAMM) is an open framework to aid organizations in:</p> <ul style="list-style-type: none"> <li>• Evaluating an organization’s existing software security practices</li> <li>• Building a balanced software security program in well-defined iterations</li> <li>• Demonstrating concrete improvements to a security assurance program</li> <li>• Defining and measuring security-related activities within an organization</li> </ul> <p>OpenSAMM is an OWASP project led by Pravir Chandra.</p>
<b>Advantages</b>	<ul style="list-style-type: none"> <li>• Built-in benchmark against nine leading software organizations (Adobe, Google, Microsoft, QUALCOMM, EMC, DTCC, Wells Fargo, etc.)</li> <li>• Comprehensive and customizable</li> </ul>	<ul style="list-style-type: none"> <li>• Easy-to-interpret checklist</li> <li>• Limited effort required to get a basic measurement of program maturity</li> <li>• Clear baseline of basic activities organizations should practice</li> </ul>
<b>Disadvantages</b>	<ul style="list-style-type: none"> <li>• No simple “checklist”</li> <li>• Requires considerable interpretation and analysis effort</li> </ul> <p><a href="http://www.bsi-mm.com">http://www.bsi-mm.com</a></p>	<ul style="list-style-type: none"> <li>• Unclear which assurance maturity level is “enough” security</li> <li>• Does not provide a frame of reference to other organizations</li> </ul> <p><a href="http://www.opensamm.org">http://www.opensamm.org</a></p>

# Building Security In Maturity Model

The Software Security Framework (SSF)			
Governance	Intelligence	SSDL Touchpoints	Deployment
Strategy and Metrics	Attack Models	Architecture Analysis	Penetration Testing
Compliance and Policy	Security Features and Design	Code Review	Software Environment
Training	Standards and Requirements	Security Testing	Configuration Management and Vulnerability Management

4 domains, each with 3 practices

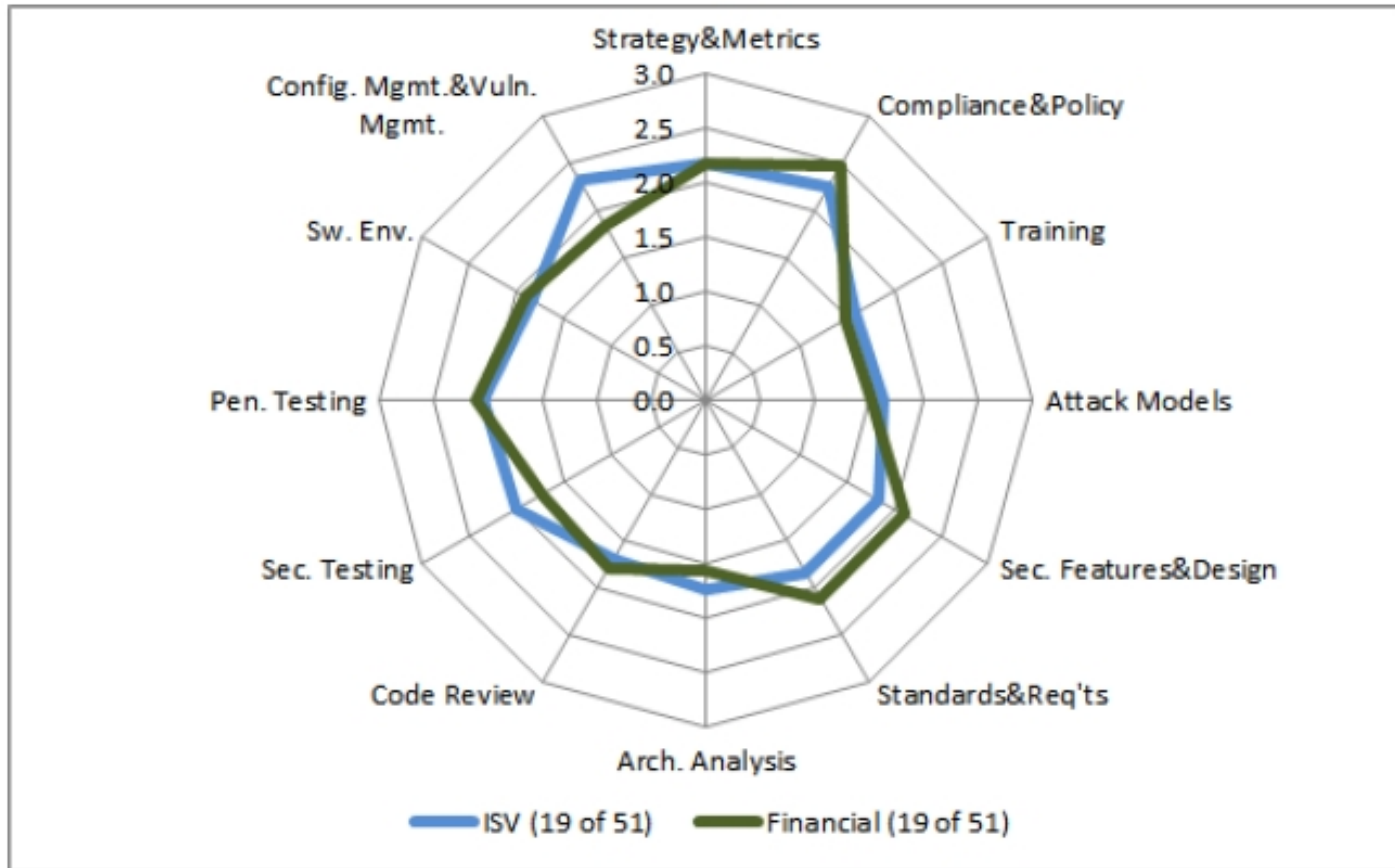
-Each Practice has 3 maturity levels

-Each Level has 1-5 activities

-111 activities in total

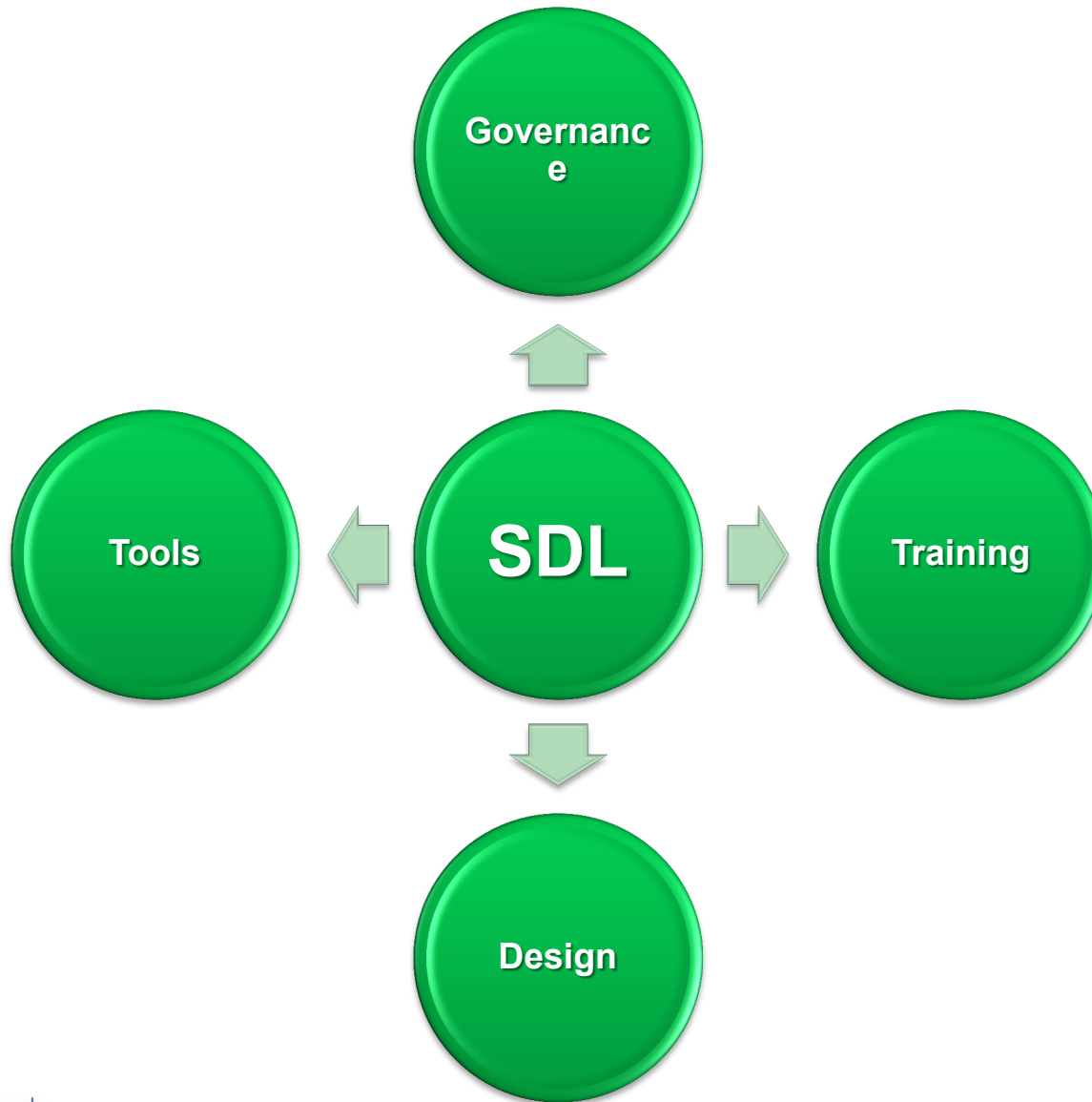
**“Note that no organization carries out all of the activities described in the BSIMM.”**

# Building Security In Maturity Model



Our combined Kiviat diagram showed obvious areas for focus

# SDL Focus Areas



# Governance

Opportunity – existing robust design review process allowed for easy integration of security tollgates

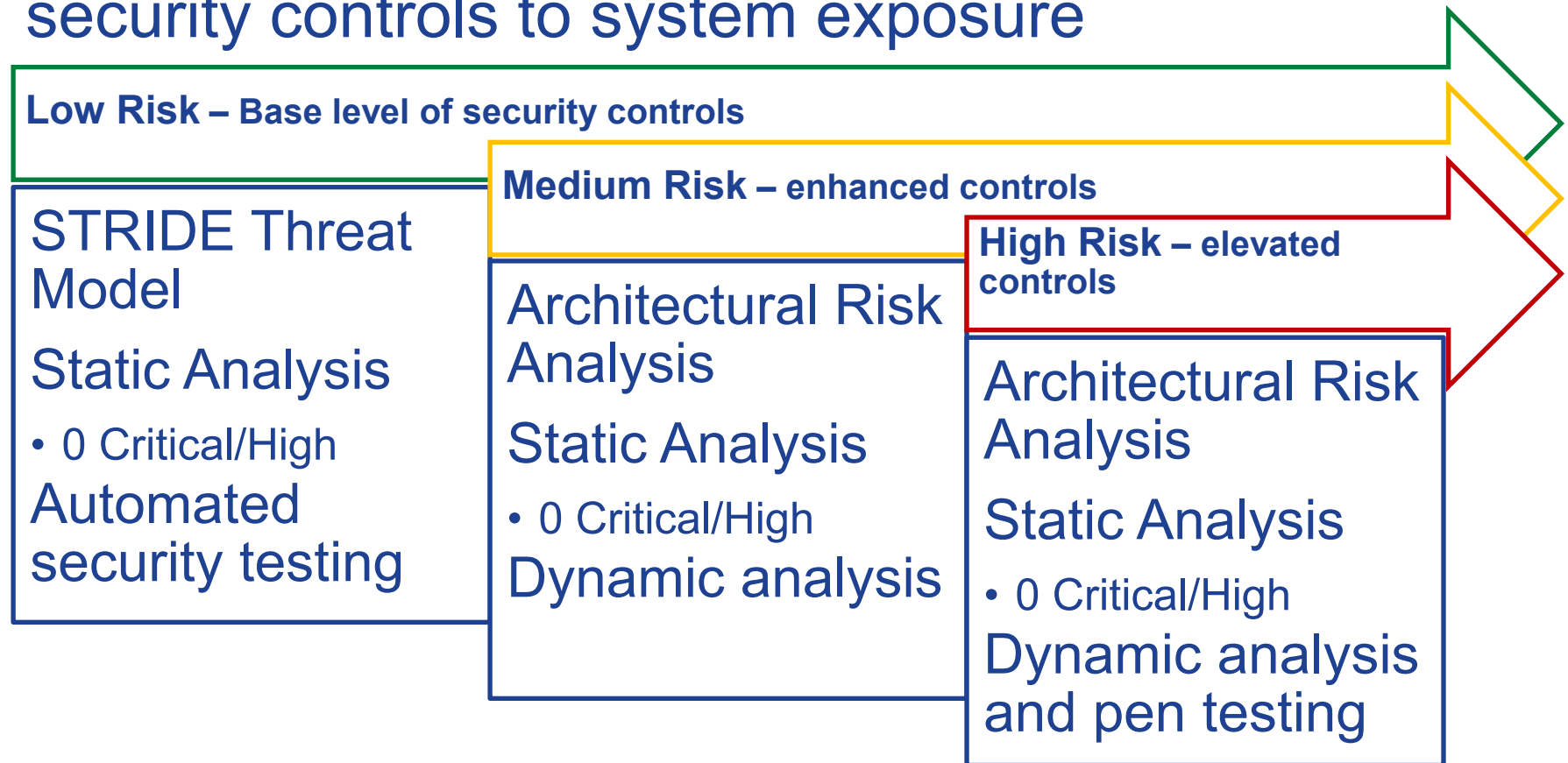
Early win that was easy to demonstrate and measure

Buy-in from Chief Architects' team made this a sustainable, scalable process

Success is having the right decisions made when you aren't in the room.

# Governance (continued)

Application risk levels – match the level of security controls to system exposure



# Training

Challenge – personnel know security is important, but don't know what “security” means, or what to do

SDL implementation will fail unless underpinned by effective security training program

Computer based training works for fundamental concepts, however, instructor led training is most effective for advanced concepts (understanding exploits, defensive coding, threat modeling, etc.)

# Training (continued)

## Role-specific security training program

- Management
- Developers
- Business Analysts/Scrum Masters
- Test/Quality Assurance
- Architects

Focus is on building awareness and hands-on skills that feed into the other facets of the SDL

Examples: Identifying security requirements, Code review and static analysis, Architectural risk assessment, Defensive coding

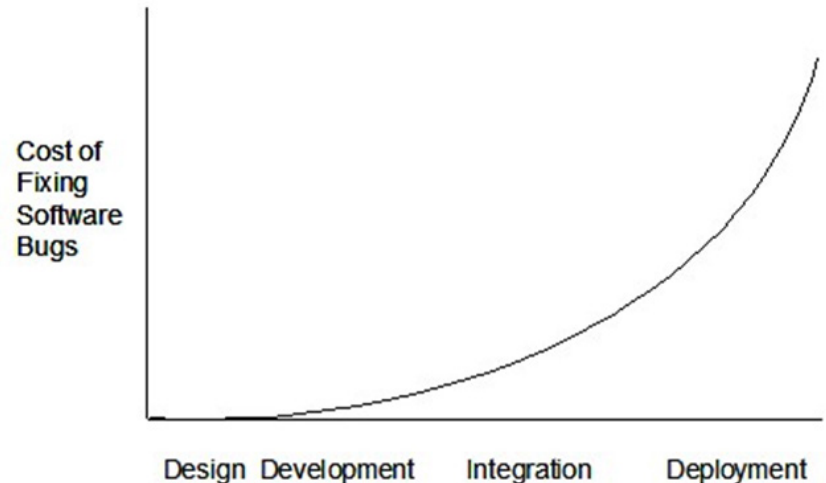
# Design

Opportunity – leverage design review process/tollgates to enforce security at beginning of lifecycle

Two primary types of security issues in applications

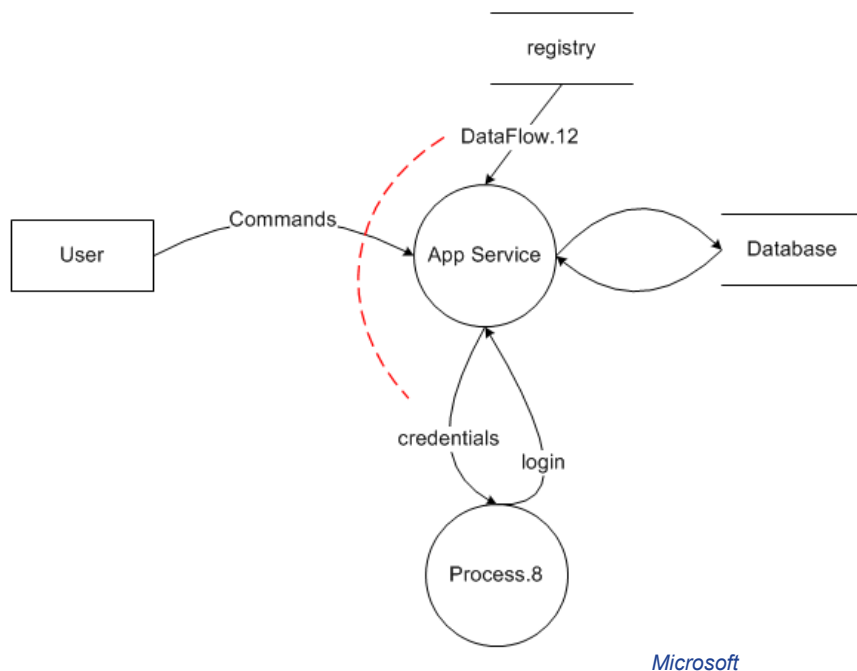
- Flaws, driven by application design
- Bugs, driven by faults/errors in coding

Goal is to identify and eliminate flaws before they get written into the application, and fix coding errors before product release



**NIST** *The Economic Impacts of Inadequate Infrastructure for Software Testing, 2002*

# Design - Threat Modeling



Threat Modeling addresses finding application flaws and areas of concern early in the design process

Required to pass through the design review process (product security plan)

Depth of model dependent on application risk level

Interesting and informative team interactions when working on model

# Design - Secure Coding Standards

Secure Coding standards provide a foundation developers refer to while coding

Compiled from industry sources and best practices, such as:

- CWE/SANS Top 25 Most Dangerous Software Errors
- Oracle's Secure Coding Guidelines for Java
- SEI CERT Secure Coding Standards for C
- And others...

Examples include input validation to prevent buffer overflow, prohibiting use of banned APIs, and using structured exception handlers

# Tools – Code Review

Both manual code review and static code analysis required

- Manual code review necessary to catch logic issues, malicious code
- Static analysis useful for consistently catching common vulnerabilities, “heavy lifting”

Static code analysis tied to nightly build process, flagging errors for immediate fix, rather than waiting until testing to find them (or not!)

Opportunity – Organization-wide effort to standardize IDEs

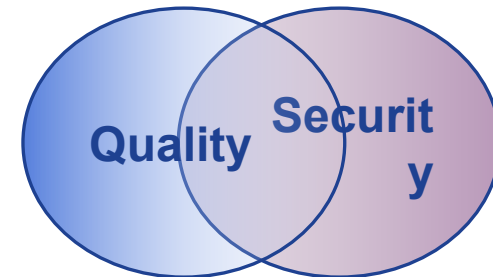
Long-term goal of deploying SCA to developer IDE

# Quick side trip – choosing an SCA tool

Security and quality teams partnered to choose tool



SCA toolsets available in the industry cover both aspects



**Unified objective: Change the quality conversation**

# Evaluation Criteria

CTQ	Typical Measurements
Quality of Results	<ul style="list-style-type: none"> <li>• Quality metrics (cyclomatic complexity, cohesion, etc.)</li> <li>• Security metrics (SANS Top 25, OWASP, etc.)</li> <li>• Action-ability of results (categorization/severity)</li> <li>• Action-ability of results (remediation)</li> </ul>
Technology Support	<ul style="list-style-type: none"> <li>• Languages</li> <li>• Platforms</li> <li>• Frameworks</li> <li>• IDEs</li> </ul>
Automation	<ul style="list-style-type: none"> <li>• Command line interface, enabling automation and incorporation into build process.</li> <li>• Pre-build scanning by development staff (scheduled vs. on-demand)</li> </ul>
Customization	<ul style="list-style-type: none"> <li>• Customization (rules/severity)</li> </ul>
Developer Focus	<ul style="list-style-type: none"> <li>• Development team opinions of tools</li> </ul>
Cost Estimate	<ul style="list-style-type: none"> <li>• License model, deployment footprint, etc.</li> </ul>
Intangibles	<ul style="list-style-type: none"> <li>• “What makes your product better than your competitors?”</li> </ul>
Ease of Use & Setup	<ul style="list-style-type: none"> <li>• Hours to configure/produce results</li> <li>• Required training</li> </ul>

# Observations

Two types of static analysis tools

- Quality driven
- Security auditor driven

Markedly different philosophies in handling findings

Most tools produce similar results, but differ in implementation/architecture

Licensing models are drastically different



# Tool Maxims

1. Tools usage  $\neq$  irrefutable assurance
2. Great auditor tools  $\neq$  great developer tools
3. Tools are not “point and scan”
4. Tools are platform and language-specific
5. Tools cannot solve process problems

-GE Security  
COE

# Beyond the four initial SDL focus areas – Security Testing

Opportunity – GE's skilled internal security assessment team located in IT

Opportunity – Mature commercial control system security assessment vendors

Opportunity – Much easier to get approval for security testing tools, IT's permission to set up security labs

Goal to use QA for some security testing, but we do not want to make them pen testers

Growing interest amongst developer community

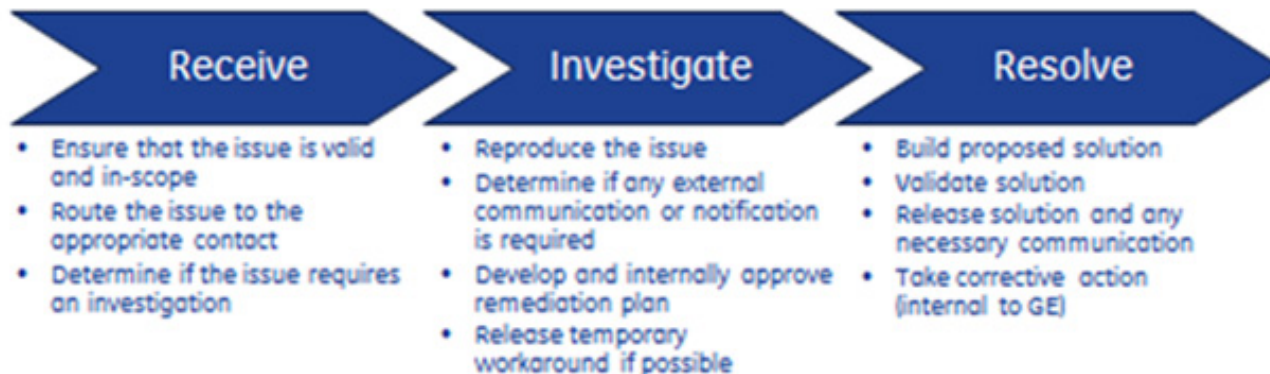
# Another critical process - Vulnerability Management

Opportunity – Strong customer support and defect resolution processes provide infrastructure for vulnerability management

Challenge – Support personnel also need to receive security training

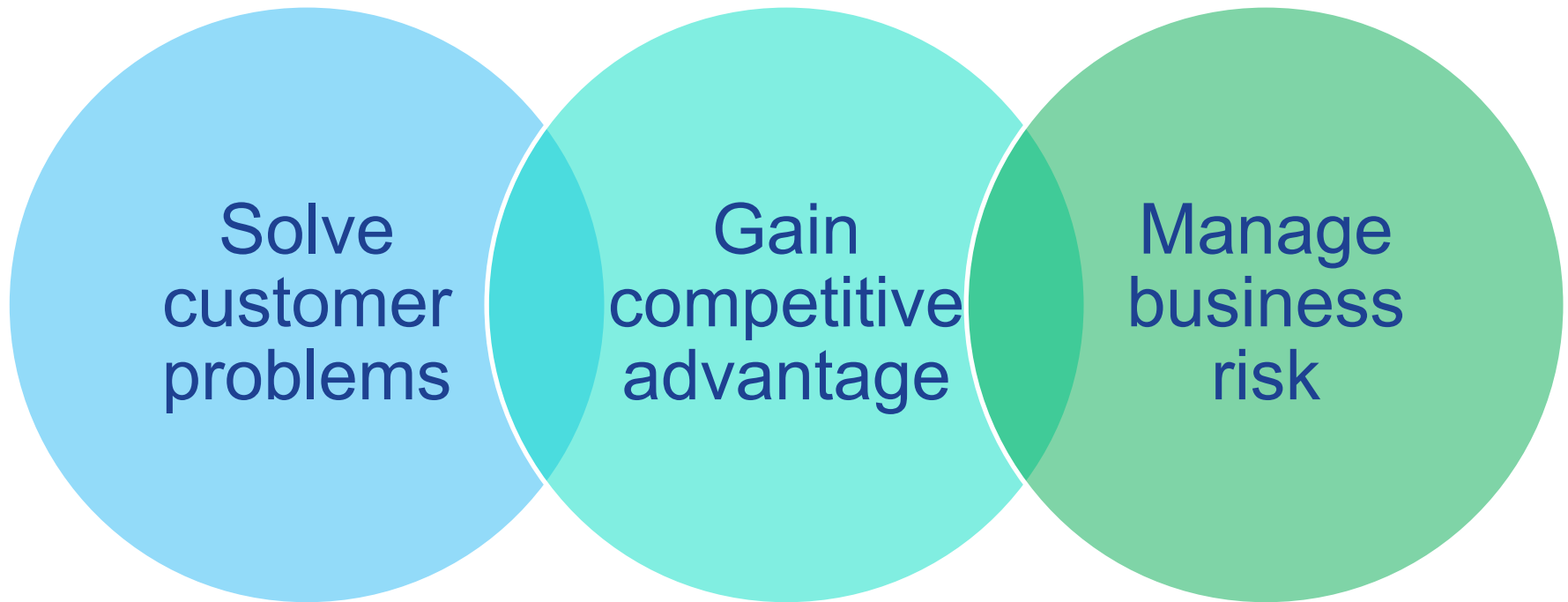
Challenge – Support processes differ between product lines, due to different market needs

## Incident response process guidance





# Market drivers for an ISV



- Address security in RFPs
- Enable customer regulatory requirements
- Conform to industry security standards

- Differentiate products with security/robustness
- Include innovative security features
- Faster to market with secure products – at a lower cost

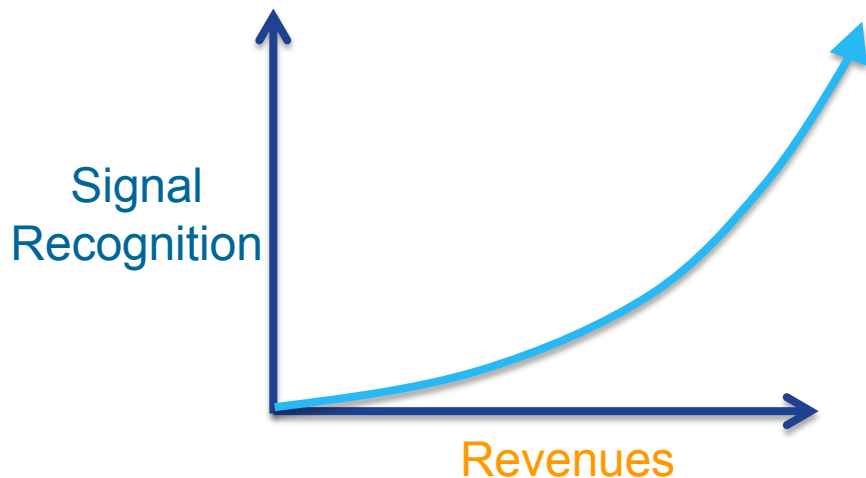
- Protect the brand
- Ensure product quality and reliability
- Respond promptly to security issues

# Security product labeling would be valuable

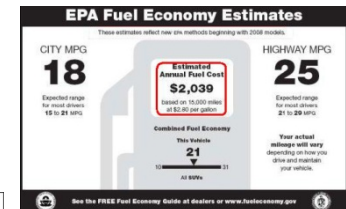
When security is viewed as a business risk, economic incentives don't necessarily drive quality and security controls during development

However, when viewed as a product capability, economic incentives naturally drive new software features & capabilities

Product Labeling democratizes product intangibles, making them visible to all buyers - not just technical experts



## Real-world labeling examples:



Nutrition Facts	
Serving Size 1 cup (227g) Amount Per Serving	
Calories 200	
Total Fat 13g	
Saturated Fat 5g	
Trans Fat 2g	
Cholesterol 30mg	
Sodium 60mg	
Total Carbohydrate 31g	
Dietary Fiber 3g	
Sugars 5g	
Protein 5g	
Vitamins & Minerals	
Calcium 15%	
Iron 4%	
Percent Daily Values are based on a diet of other people's secrets. Your daily values may vary slightly depending on your individual needs.	
Calories: 200	
Total Fat: Less than 65g	
Saturated Fat: Less than 30g	
Cholesterol: Less than 300mg	
Sodium: Less than 2,400mg	
Total Carbohydrate: 30g	
Dietary Fiber: 25g	
Sugars: 35g	
Protein: 4	
Calcium: 4	
Iron: 4	



www.nhtsa.gov

Sources: David Rice, Presentation to GE Product Security Working Group, 7/27/2010



Wikipedia - [http://en.wikipedia.org/wiki/Signalling\\_%28economics%29](http://en.wikipedia.org/wiki/Signalling_%28economics%29)  
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# Multitude of regulatory and standards drivers

NIST SP series and NISTIR 7628

ISO 27001

ISO 15408 “Common Criteria”

ISA-99, now ISA/IEC-62443

SEI CERT SCALe for Energy Delivery Systems

CIS/DISA/FISMA....

Our customers are most concerned about NERC

CIPS



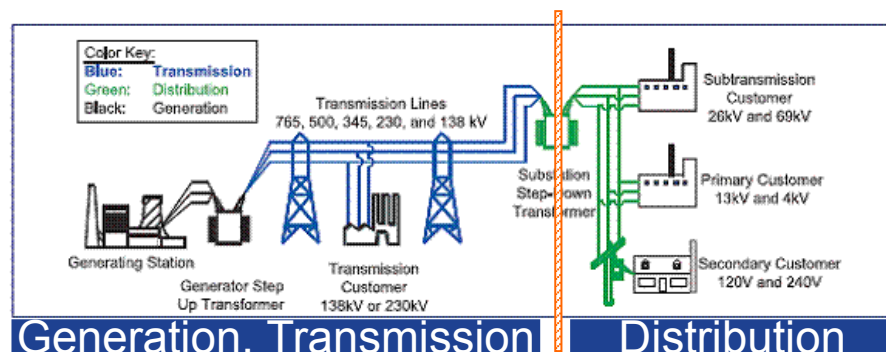
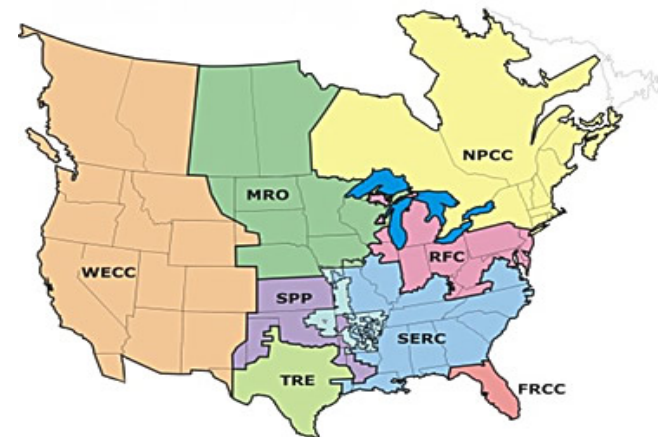
# NERC CIPS

Every utility has a slightly different interpretation

Enforcement has varied among regions

Line between Transmission and Distribution is clear now, but less so in the future

This makes it difficult for both utilities and vendors



# NERC compliance penalties are real...

...but are sometimes used to drive FUD – fear, uncertainty, and doubt (\$1,000,000 per day per incident)

However, the \$ amount of enforcement actions is growing

~\$150,000 max in 2011 to \$350,000 in July, 2013

	Violation Severity Level							
Violation Risk Factor	Lower		Moderate		High		Severe	
	Range Limits/Day		Range Limits/Day		Range Limits/Day		Range Limits/Day	
	Low	High	Low	High	Low	High	Low	High
Lower	\$1,000	\$3,000	\$2,000	\$7,500	\$3,000	\$15,000	\$5,000	\$25,000
Medium	\$2,000	\$30,000	\$4,000	\$100,000	\$6,000	\$200,000	\$10,000	\$335,000
High	\$4,000	\$125,000	\$8,000	\$300,000	\$12,000	\$625,000	\$20,000	<b>\$1,000,000</b>

# Questions

