Unit#4c

Data Protection MIS5214

Agenda

- Data protection by design
- System Security Plan
 - Security control inheritance
 - Team project SSP review and discussion

Data security by design and default...

Data protection capabilities must work from beginning to end of data processing to enable protection of individuals' personal data by default

Art. 25 GDPR Data protection by design and by default

- (1) Taking into account the state of the art, the cost of implementation and the nature, scope, context and purposes of processing as well as the risks of varying likelinoid and sevently for rights and freedoms of natural persons posed by the processing, the controller shall, both at the time of the determinant of the means for processing and set the time of the processing itself, implement appropriate technical and organisational measures, such as pseudorymisation, which are designed to implement disks-protection principles, such as data minimisation, in an effective manner and to integribe the necessing allegards into the processing in order to meet the requirements of this Regulation and protect the rights olds subjects.
- 27 Introduction that in general exposurable includes an indigensation in tessors by our ensuring that you default, only personal data which are necessary for each periodic purpose of the processing are processed. That obligation applies to the amount of personal data collected, the extend of their processing, the period of their storage and their accessfully in particular, such measures shall ensure that by default personal data are not made accessful extend the individual's intervention to an individual personal data are not made accessfully without the individual's intervention to an individual repensor.
- (3) An approved certification mechanism pursuant to Article 42 may be used as an element to demonstrate compliance with the requirements set out in paragraphs 1 and 2 of this Article



Danezis, G. et al. (2014) "Privacy and Data Protection by Design", European Union Agency for Network and Information Security (ENISA)

D' Acquisto, G. et al. (2015) "Privacy by design in big data", European Union Agency for Network and Information Security (ENISA)

Key General Data Protection Regulation (GDPR) requirements:

- 1. Collection of personal data is fully avoided or minimized at the earliest stage of processing
- 2. Data subjects give <u>specific</u>, <u>informed</u> and <u>explicit</u> consent to the processing of their data
- 3. Data subjects have **right to access, review and rectify** their personal data
- 4. Data subjects have the **right to withdraw given consent** with effect for the future and
 - Block access
 - Constrain processing and use
 - Erase their personal data
- 5. Personal data obtained for one purpose must not be processed for other purposes not compatible with the original purpose

Achieving "Privacy by Design" is difficult

Privacy is a complex, multifaceted and contextual notion Not the primary requirement of an information system May come into conflict with other requirements

"...privacy and data protection features are... ignored by traditional engineering approaches when implementing desired functionality.

 This ignorance is caused by limitations of awareness and understanding of developers and data controllers as well as lacking tools to realize privacy by design"

> Danezis, G. et al. (2014) "Privacy and Data Protection by Design", European Union Agency for Network and Information Security (ENISA)

Privacy and Data Protection by Design

"Although the concept has found its way into legislation as the... European General Data Protection Regulation, its concrete implementation remains un-clear at the present moment"

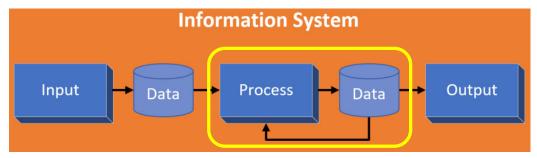
Danezis, G. et al. (2014) "Privacy and Data Protection by Design", European Union Agency for Network and Information Security (ENISA)

Some challenging data protection requirements may be solved with techniques presented here...

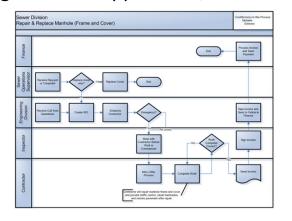
- 1. Collection of personal data is fully avoided or minimized at the earliest stage of processing
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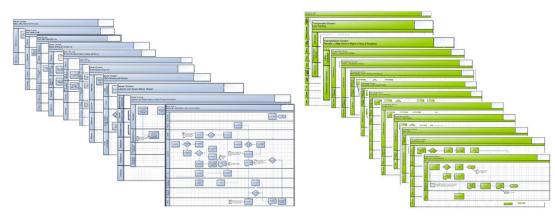
As a practical matter...

Data within information systems are often stored and organized as datasets within files and/or databases...



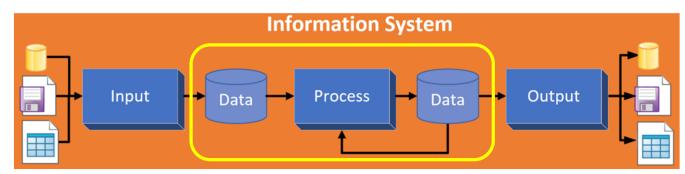
Regardless of application, there is reliance on data processing workflows to produce and use information



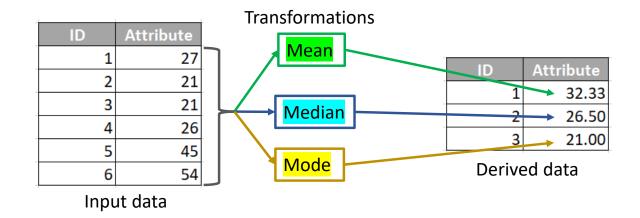


Data processing often transforms existing data into new data, which is a double-edged sword...

The resulting database may have more information than the older version



The **meaning** of the new information, however, **is exogenous and not found in the data itself**



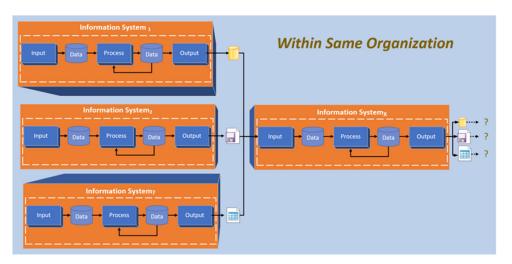
Evaluating & judging data's "fitness for use"

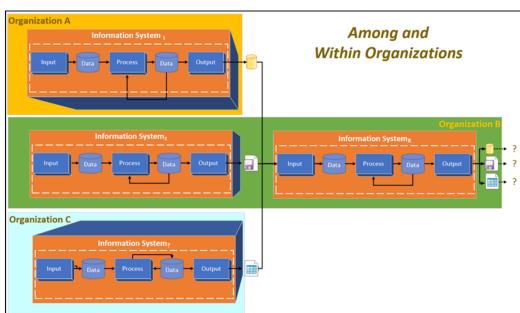
- Is not the responsibility of the producer
- Is the responsibility of the user ...and IT Auditor

Data produced for one purpose is often used to serve other purposes

Data producers should provide information about data that permit informed determinations of fitness for use

Datasets are often exchanged without information needed to determine their fitness for use...





Provenance

The Bridge at Villeneuve-la-Garenne 1872 by Alfred Sisley British

Provenance traces back to 1294 in Old French as a derivative of the Latin provenire

• To come from, to be due to, be the result of

In the art domain provenance entails an artifact's complete ownership history



Provenance refers to the **origin, history, and journey of data** as it moves through different systems, transformations, and users. It ensures **transparency, traceability, and accountability** by documenting how data was created, modified, and shared.

There is an established research process for obtaining an artifact's trusted provenance

• The information is highly valued, particularly to authenticate real versus fraudulent works

"Provenance" is now increasingly used in a broad range of fields with various degrees of conflation of two closely related but distinct concepts of trust and metadata

Provenance

W3C Provenance Incubator Group's definition of provenance (in a web resource context):

- Provenance is a record that describes entities and processes involved in producing and delivering or influencing a resource
- Provenance provides a critical foundation for assessing authenticity, enabling trust, and allowing reproducibility
- Provenance assertions are contextual metadata that can become important records with their own provenance

https://www.w3.org/TR/prov-primer/

Why is Provenance Important?

- Transparency: Helps understand the source and trustworthiness of data.
- Accountability: Supports compliance with regulations like GDPR, HIPAA, and PCI DSS.
- **Data Integrity**: Ensures that data is accurate, unaltered, and verifiable.
- **Security**: Helps detect unauthorized modifications and data leaks.
- Audit & Compliance: Provides a detailed history of data usage for regulatory audits.

Data Lineage

What is Data Lineage?

Data lineage refers to the process of tracking **the flow, transformation, and dependencies of data** across different systems and processes. It provides a **visual and structured history** of how data moves through an organization, from its **origin (source)** to its **final destination**

Why is Data Lineage Important?

- Regulatory Compliance (GDPR, HIPAA, CCPA): Helps organizations track and verify how personal data is handled.
- **Data Governance**: Ensures accuracy, consistency, and quality of data across the enterprise.
- Security & Risk Management: Detects unauthorized modifications or data breaches.
- Impact Analysis: Helps understand how changes in data sources affect downstream systems.
- **Debugging & Troubleshooting**: Identifies data errors and inconsistencies.

Early metadata standards for documenting lineage of data produced with Geographic Information Systems

Metadata is "data about data"—it provides descriptive, structural, and administrative information about a file, document, image, or dataset. It helps users organize, find, manage, and understand data efficiently.



Geographic Information System (GIS)

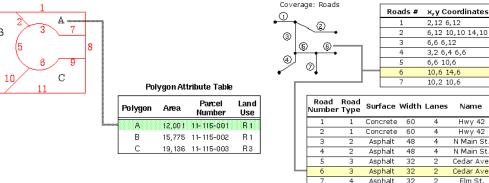
 Provides similar data import, query, manipulation, analysis (e.g. statistics), reformat, display/visualization, output and report capabilities as other

information systems

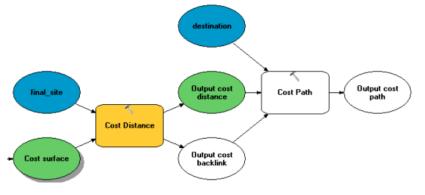
Also organize their data in

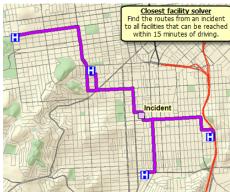
Data base management systems

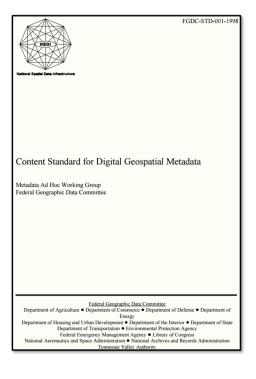
• File systems

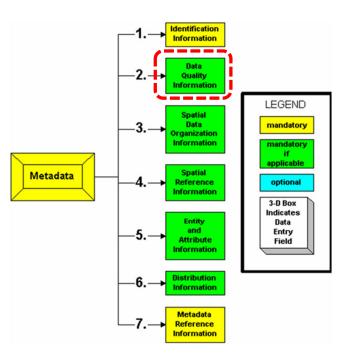


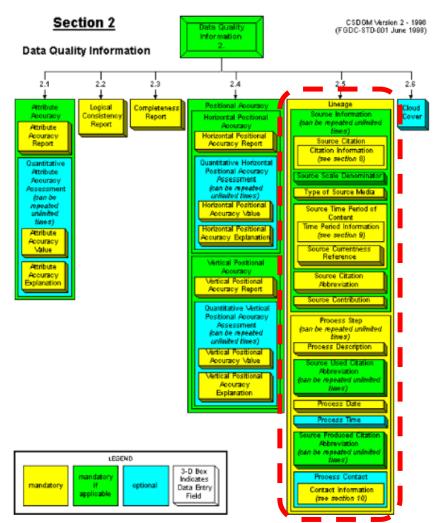
With the addition of spatial analysis and cartographic mapping capabilities



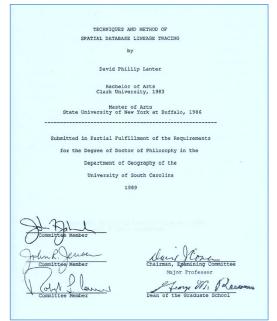


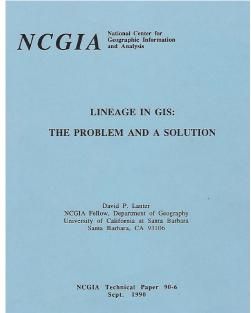


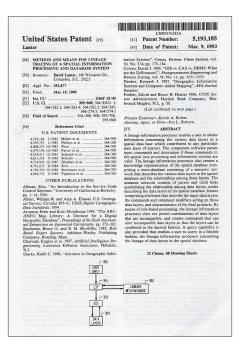


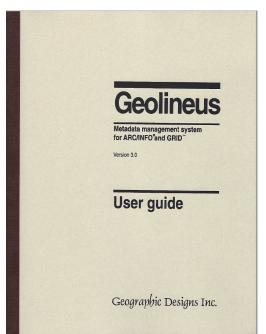


The first metadata system focused on GIS data lineage

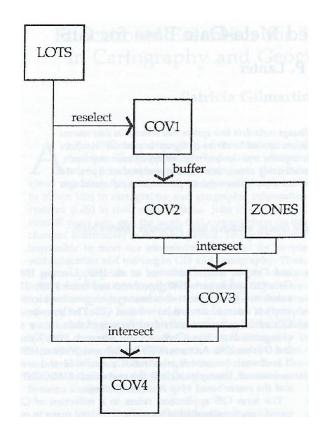


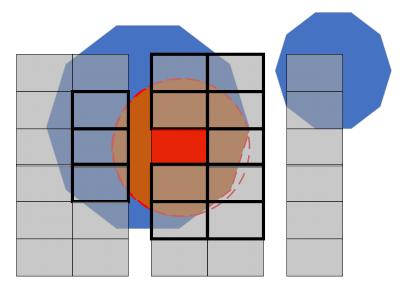






Information processing steps in the head of the user as he transformed the LOTS and ZONES datasets to derive COV4...



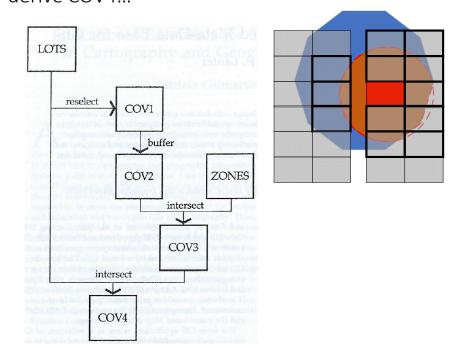


LOTS usually refer to parcels of land that are individually owned or designated for specific uses.

ZONES represent **areas with specific land use designations** or characteristics.

A coverage category (COV) in GIS that classifies land based on certain attributes (e.g., vegetation, impervious surfaces, or land cover classification).

Information processing steps in the head of the user as he transformed the LOTS and ZONES datasets to derive COV4...



Datasets presented by the operating system after data processing concluded...

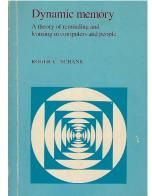
Datasets organized as files in folders

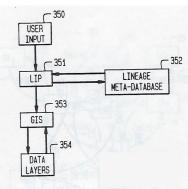
| OUTPUT ONELOT DAV1 FINAL COV3 COV4 BUF COV2 DAV3 DAV4 | V | 5-05-89 5-05-89 5-24-89 5-05-89 5-05-89 5-05-89 5-06-89 5-31-89 5-24-89 5-24-89 5-24-89 5-24-89 5-31-89 5-31-89 5-31-89 | 10:26a 10:26a 11:35p 10:26a 10:26a 10:27a 10:27a 11:52a 1:35p 12:27p 11:46p 11:51p 12:21p 11:42p 1:45p 1:45p 1:42p |
|---|---|---|--|
|---|---|---|--|

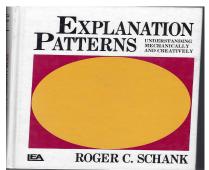
How can I program the computer to help me remember what I knew about the data I was processing when I was

processing it?

To help your computer remember what you knew about the data when you were processing it, you need a metadata-driven logging and tracking system. This system should capture context, transformations, decisions, and rationale at each step of data processing.

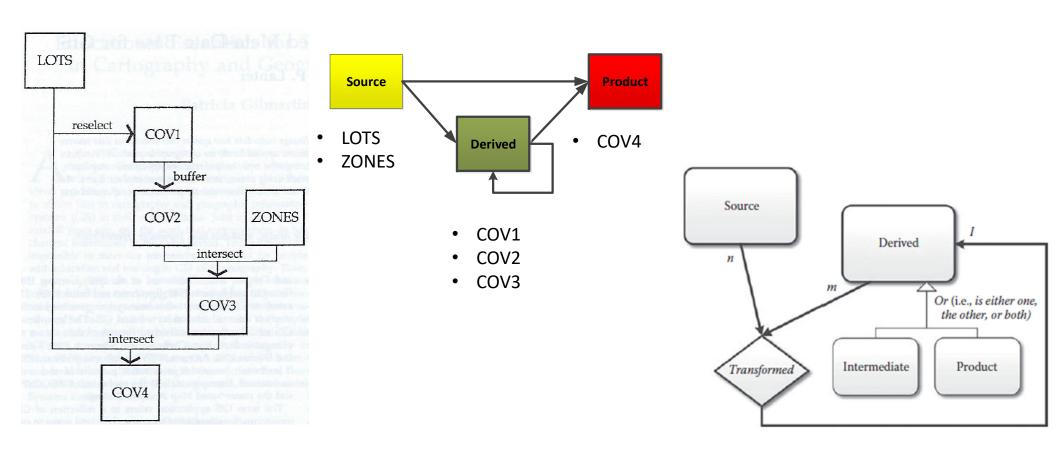






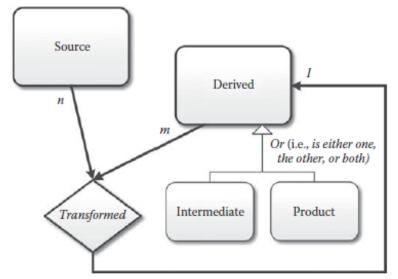
LIP = Lineage Information Processor

How do we understand differences among datasets created during processing applications?



Data lineage vocabulary helps communicate how data is processed in an information system

and can aid thinking about how to meet privacy by design requirements

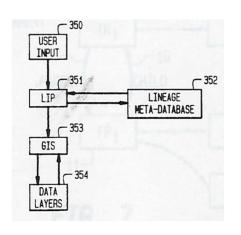


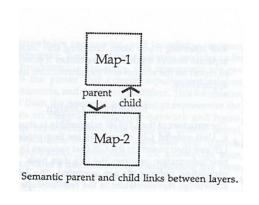
Source datasets may contain personal data

Derived datasets inherit this personal data from their input

- Using transformations such as:
 - Relational database joins and relates
 - Queries, arithmetic, statistical, spatial processing...

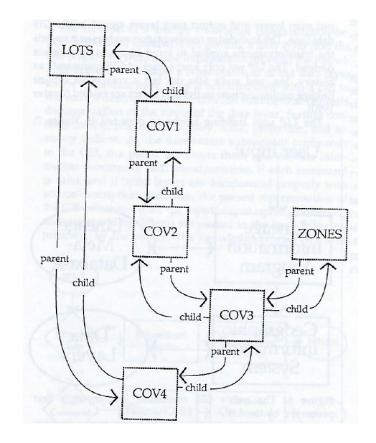
Semantic "parent" & "child" metadata links added to enable deductions about relationships among input & output datasets...





Input datasets provided with parent links pointing to output datasets can answer the question: **Who am I the parent of?**

Output datasets' child links connect them back to their input datasets can answer the question: Who am I the child of?

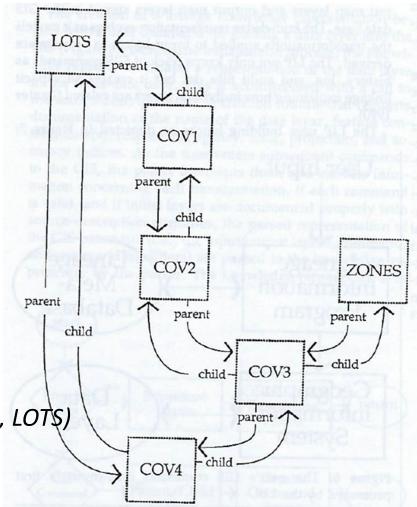


Descendants function traces parent links to identify all datasets derived from a source or other derived input dataset used within the application.

Descendants ("LOTS") = (COV1, COV2, COV3, COV4)

Ancestors function traces child links to identify input datasets used to create a derived dataset

Ancestors ("COV4") = (LOTS, COV3, ZONES, COV2, COV1, LOT\$)



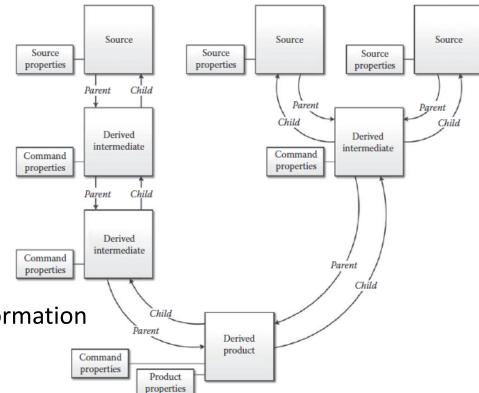
Source properties can include:

- Originating organization
- Data content (i.e. entity and attribute definitions)
- Timeliness (e.g. when collected, when acquired,...)
- Accuracy
- Confidentiality security categorization of attributes
 - Privacy sensitivity of attributes
- Integrity categorization of attributes...
- Availability categorization...

Command properties include details of the transformation

Product properties include the product's

- intended goal
- Users
- when published
- responsible manager,...



Meet Geo_lineus source metadata input

```
(geo_lineus)I am Geo_lineus
Please give me information or ask questions: import cover landuse

What is the source name? landuse-landcover

Containing what cartographic features? hydrography urban agriculture wetland

What is the source date? 3/12/75

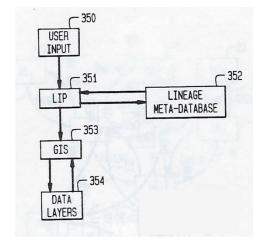
What is the source agency? USGS

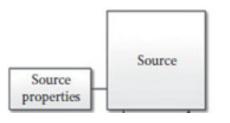
What is the source scale? 1/24000

What is the source projection? UTM

What is the source accuracy? +-80 meters

Thank You!
```





| SOURCE DESCRIPTION FRAME | | |
|--------------------------|--------------------|--|
| SOURCE: | Digital line graph | |
| FEATURES: | Hydrography | |
| S_DATE: | 4/7/83 | |
| AGENCY: | USGS | |
| SCALE: | 1:100,000 | |
| PROJECTION: | Mercator | |
| ACCURACY: | +-10 meters Horiz | |

Command metadata input...

```
(geo_lineus)

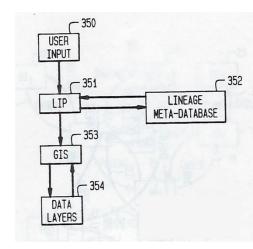
(I AM GEO_LINEUS)

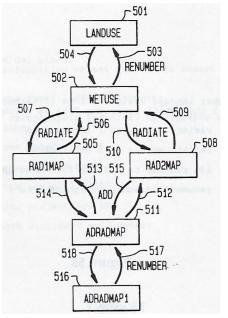
(PLEASE GIVE ME INFORMATION OR ASK QUESTIONS) (renumber landuse assigning 1 to 2 through 13 assigning 0 to 1 through 11 assigning 0 to 14 through 18 for wetuse)

(I UNDERSTAND) (radiate wetuse to 2 for rad1map)

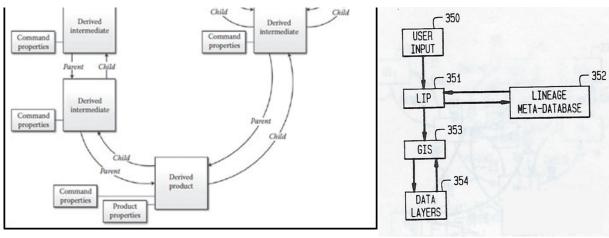
(I UNDERSTAND) (radiate wetuse to 6 for rad2map)

(I UNDERSTAND) (add rad1map to rad2map for adradmap)
```





Product Metadata input...



export cover adradmapl eco zones

What is the product's name? eco_zones

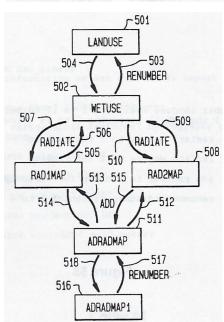
What is the product's use? Environmental protection of wetlands

Who are the product's users? Dept of Health and Environ. Conservation

Who is responsible for the product? Diego Essinger

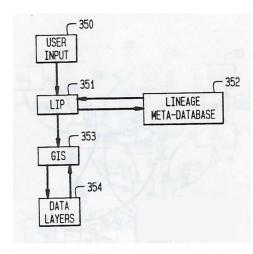
What is the product's release date? 3/5/89

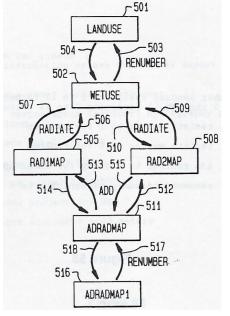
Thank You!



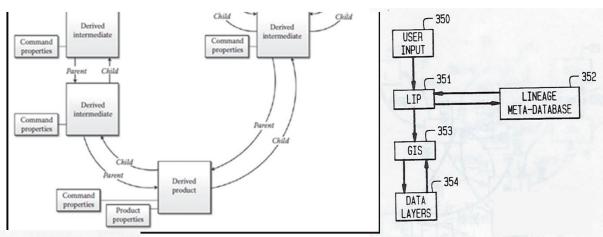
Querying metadata...

Is landuse a parent of adradmap (YES INDEED LANDUSE IS A PARENT OF ADRADMAP)





Querying metadata...



What is the lineage of adradmap1

(INPUT TO ADRADMAP1 IS ADRADMAP COMMAND IS RENUMBER)

(INPUT TO ADRAPMAP IS RAD2MAP RAD1MAP COMMAND IS ADD)

(INPUT TO RAD2MAP IS WETUSE COMMAND IS RADIATE)

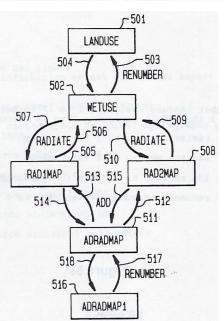
(INPUT TO WETUSE IS LANDUSE COMMAND IS RENUMBER)

(LANDUSE IS AN ORIGINAL MAP LAYER)

(INPUT TO RADIMAP IS WETUSE COMMAND IS RADIATE)

(INPUT TO WETUSE IS LANDUSE COMMAND IS RENUMBER)

(LANDUSE IS AN ORIGINAL MAP LAYER)

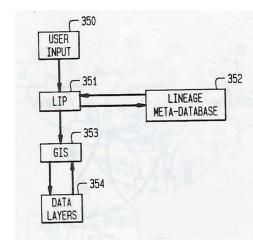


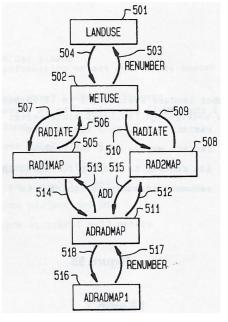
Querying metadata...

What are the final products of landuse (ADRADMAP1 IS A PRODUCT MAP LAYER)

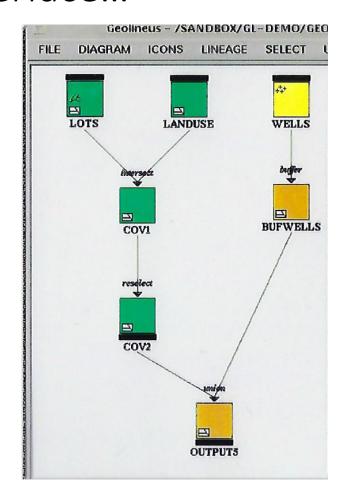
Why is rad2map a parent of adradmap1

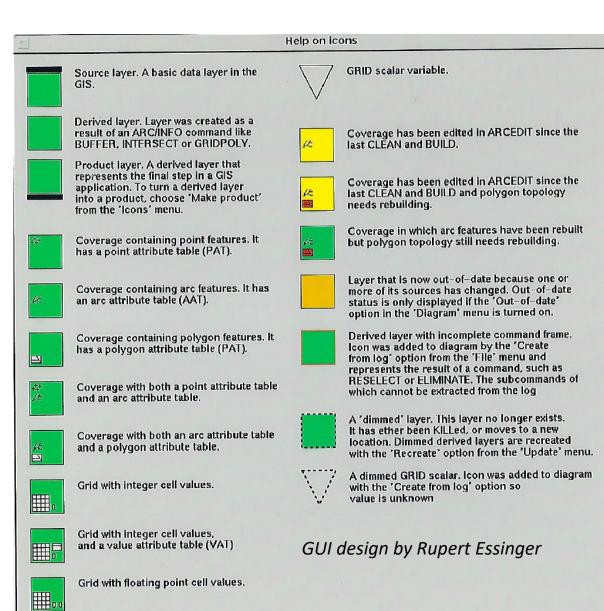
(BECAUSE RAD2MAP IS A PARENT OF ADRADMAP AND ADRADMAP IS A PARENT OF ADRADMAP1)



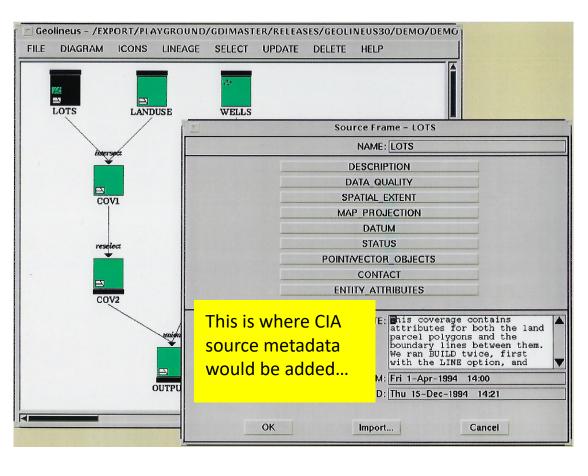


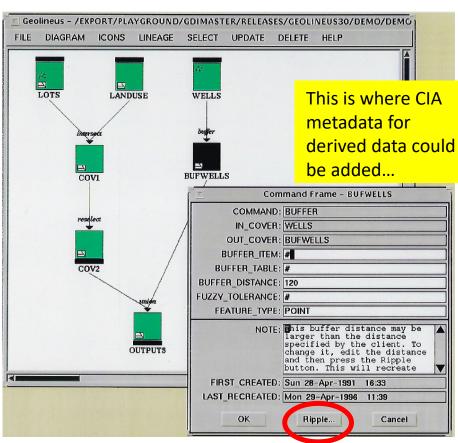
Adding a graphical user interface...



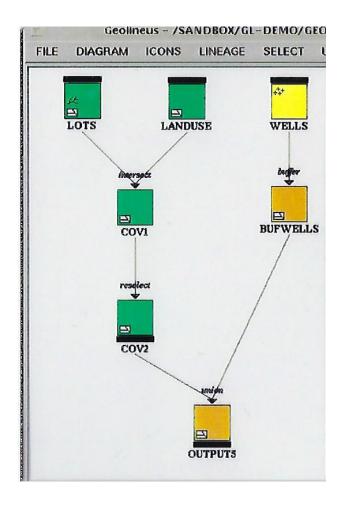


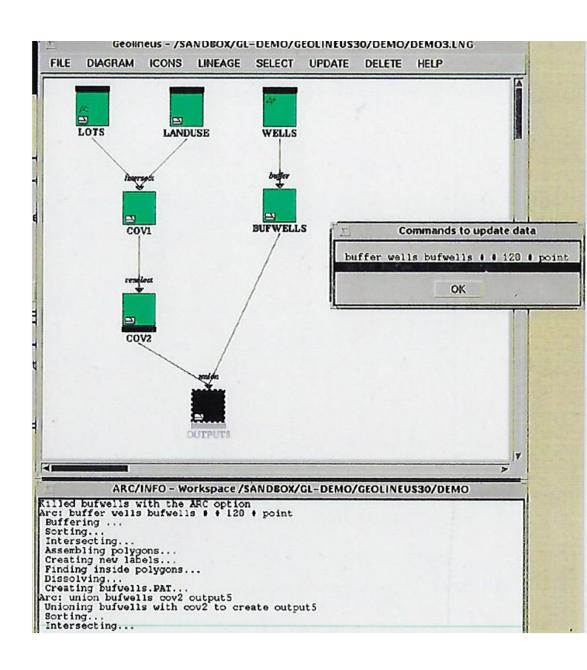
Working with source and command metadata



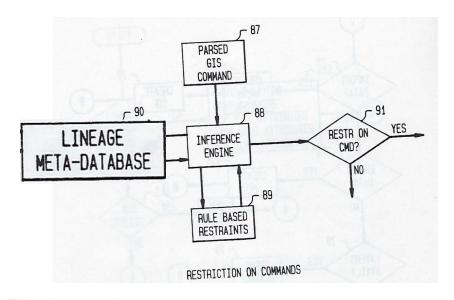


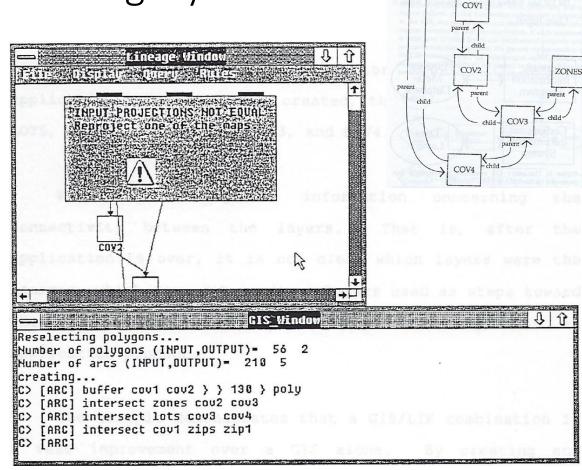
Update propagation...





Data source metadata based integrity constraint





Data lineage metadata can help information systems meet key data privacy by design requirements, including:

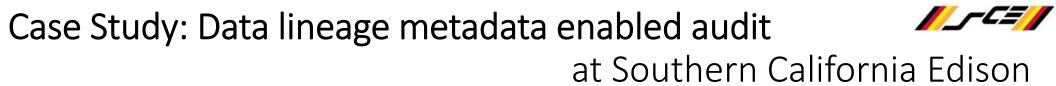
- Enabling data subjects access, review and rectify their personal data?
- Enable data subjects to withdraw given consent with effect for the future by:
 - a. Blocking access to their personal data?
 - b. Constraining processing and usage of their personal data?
 - c. Erasing their personal data?
- Blocking and restricting personal data obtained for one purpose from being processed for other purposes not compatible with the original purpose

LINEAGE

MFTA-DATABASE

PARSED GIS COMMAND

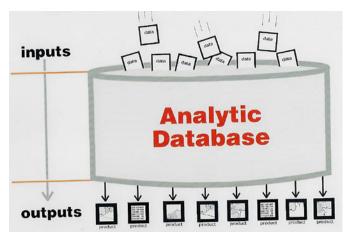
INFERENCE ENGINE

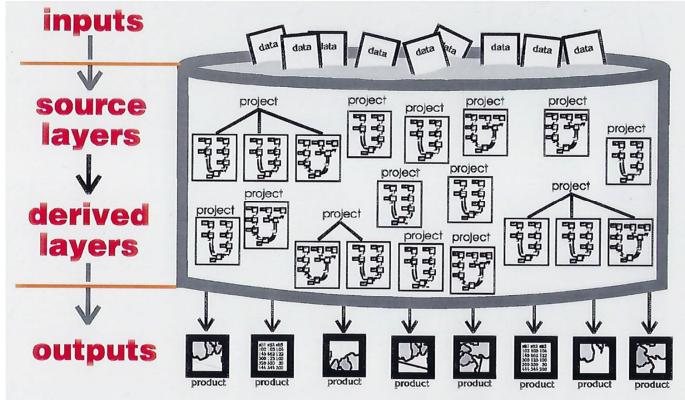


Focus of the audit:

- 1. Documentation and understanding of GIS decision support data
- 2. Replicability of data used in decision making

Data provenance audit problem...





Metadata Analysis of data and processing

Geolineus user guide

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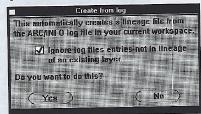
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Creating a new lineage diagram

The Geolineus "Create from log" option in the "File" menu automatically creates a line ge diagram for an ARC/INFO workspace by reading the workspace's ARC/INFO log file. The workspace log file is maintained by ARC/INFO and records the commands and their parameters that have been performed on the layers in that workspace. When "Create from log" reads a workspace's log file it looks for ARC/INFO commands that process data (see "Help on commands" from the Geolineus "Help" menu for a list of these commands) and creates a lineage diagram to represent the processing that has taken place.

- 1. Make sure you are in the ARC/INFO workspace (appeal 1) you want to document.
- 2. Select "Create from log" from the "File" menu. This box pops up (♣).

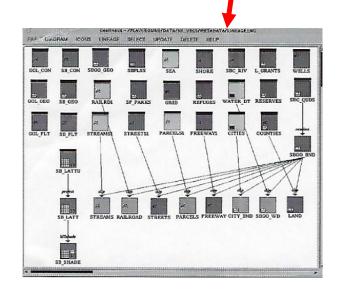


The check option enables you to choose whether or not the diagram that "Create from log" will create will include lineage for layers that no longer exist. Normally, Geolineus will ignore any lines in the log file that do not contribute to the lineage of an existing layer. This results in a lineage diagram that documents the current state of the workspace.

If you uncheck the option, Geolineus creates a diagram using all the lines in the log file, even if they are in the lineage of layers that no longer exist. This results in a diagram showing what has happened previously in the workspace in addition to its current state. Use this to example to create a from a log file for which the data is unavailable.

Log Files

| 198923021442 198923021442 198923021442 198923021505 198923021505 198923021512 198923021514 198923021516 198923021520 198923021520 198923021520 198923021520 198923021520 198923021530 198923021530 198923021530 198923021530 | 100000212200005033 | 3 10 1 44 3 15 24 6 4 2 0 1 3 71 1 72 85 | OARCPLOT OBUILD NISLAND POLY OEXTERNAL NISLAND OARCPLOT OPOLYGRID NISLAND Opolygrid nisland Ogridpoly nisland.svf nigrid 662795 680175 30 30 Oarcplot Oarcplot Oarcplot Oexternal nisland Oexternal nigrid Oexternal nigrid Oarcplot Oarcedit ORENAME NIGRID NIG30 OPOLYGRID NISLAND GR10.SVF OGRIDPOLY GR10.SVF NI10 662795 680175 10 10 |
|--|--------------------|--|---|
| | | | |

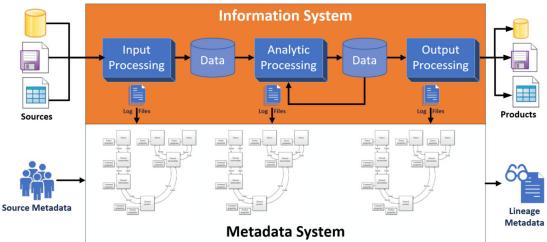


Lineage metadata enabled audit of data and processing



9 visits with SCE's GIS Lab's technical staff in 1992, collected:

- 1. Descriptions of 14 data processing projects
- 2. Metadata for data sources that were acquired and imported into the enterprise GIS database for the projects
- 3. Processing log files for the projects



Lineage metadata enabled audit of data and processing at Southern California Edison



1. Descriptions of 14 data processing projects

...for 7 corporate divisions were examined:

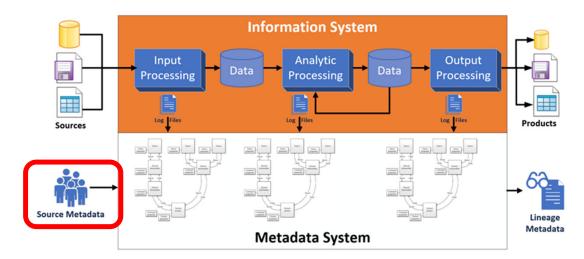
- **Customer Service**
- Engineering
- **Environmental Research**
- **Information Services**
- Power Generation
- Project Development
- Sewer & Hydrologic Engineering

| Project | Output | Deliverable | | | |
|---------|----------------------|---|--|--|--|
| 1 | 1 map | Spatial distribution of SCE substations relative to important features | | | |
| 2 | 5 maps | SCE's Service Territory and its various features | | | |
| 3 | 1 map | SCE's Service Territory and various features | | | |
| 4 | 1 map | Areas in Redlands CA near power lines containing sensitive species | | | |
| 5 | 1 map | Areas in Victorville CA near transmission lines containing sensitive species | | | |
| 6 | 1 map | Route of proposed pipeline from Mandalay facility to Ormond Beach facility | | | |
| 7 | data file | Locations of historic sites in Redlands CA | | | |
| 8 | database | Land use information for species habitat study | | | |
| 9 | 1 map | Land use, street network, elevation contours in areas around microwave stations | | | |
| 10 | Map | Land use and street network reference map of Ormond Beach area | | | |
| 11 | 21 maps data file | 3 maps each for 7 dam/reservoir sites in SCE Territory; Data file of calculated terrain units for use in hydrologic modeling project | | | |
| 12 | database | Environmental site suitability models for locating artificial reef to mitigate impact of San Onofre Nuclear Generation Station as requirement of operation permit | | | |
| 13 | 1 map | SCE Service Territory's relationships between switching and intermediate processing centers | | | |
| 14 | 2 maps | Congressional boundaries and demographic data | | | |

Linage metadata enabled audit of data and processing at Southern California Edison



- Identified data acquired from internal and external sources and collected metadata on these data
 - Entity types ("features") and attribute content
 - **Format**
 - Area covered
 - Scale and spatial resolution
 - Spatial coordinate system
 - Spatial projection
 - Supplying agency
 - Original source organization
 - Original publication date
 - Production source date
 - Responsible staff member
 - Statement of data quality

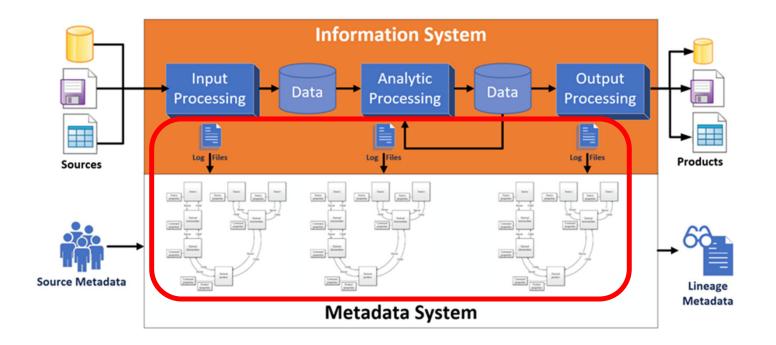




at Southern California Edison

3. Processing log files obtained for each of the 14 projects

Reverse engineer lineage metadata from the log files





at Southern California Edison

GIS Lab analysts identified 54 data files input into the Information System to support their projects, obtained from:

- Internal client department
- Other internal departments
- California state agencies
- Outside consultants

Log processing identified 806 datasets referenced in the log files:

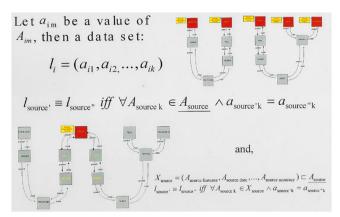
- 487 source datasets (i.e. lacking child links pointing to inputs)
- 319 derived datasets



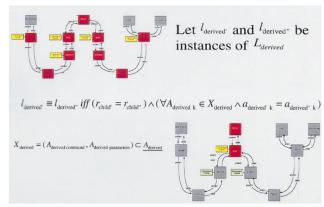
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Next step... would have focused on use of metadata analysis to identify commonalities and differences in:

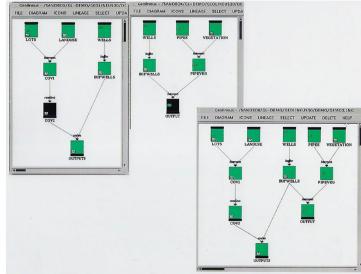
- 1. Source data usage
- 2. Analytical processing logic



Source equivalence testing



Derived equivalence testing





at Southern California Edison

But... findings:

- 1. Much metadata for documenting the data sources were missing...
 - GIS Lab Technical Staff analysts were unable to remember much about the data they had used in earlier projects
 - Of the 54 data files used as input to the GIS database:
 - 89% were of unknown Spatial Projections
 - 79% were of unknown Original Publication Dates
 - 70% were of unknown Scales and Spatial Resolutions
 - 68% were from unknown Original Source Organizations
 - 43% contained attributes and spatial data assumed "fit for use" but untested

Metadata enabled audit of GIS data and processing at Southern California Edison



Findings:

- 2. Lack of naming conventions for identifying primary data source files and source datasets once they were imported into the Information System
 - For example,
 - "TER" used as mnemonic device to name datasets after import:
 - 5 datasets in Project 1: TERBND, TER.MRK, TERMRK1, TERMRK2, and TERMERK3
 - 3 datasets in Project 2: TERRITORY, SCE-TERR, SCE-TERR2
 - Information Analysts could not differentiate them

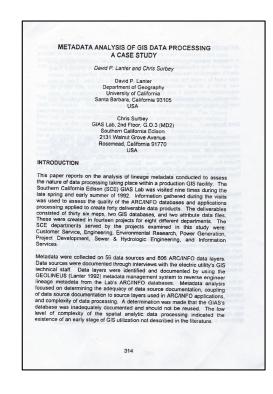
Utility company only had one service territory boundary, there were 8 different versions of it. Without taking the itme to visually inspect and compare the actual data – it was not clear what, if any, significant differences existed among the versions

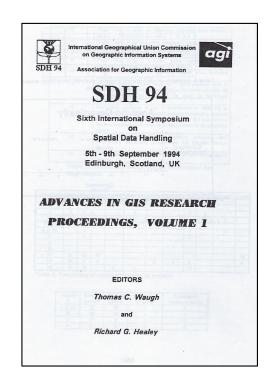


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Recommendation:

• GIS Lab's "...database was inadequately documented and should not be reused."





Conclusion: Data lineage metadata can help information systems meet key data privacy by design requirements, including:

- Enabling data subjects to access, review and rectify their personal data
- Enable data subjects to withdraw given consent with effect for the future by:
 - a. Blocking access to their personal data?
 - b. Constraining processing and usage of their personal data?
 - c. Erasing their personal data?
- Blocking and restricting personal data obtained for one purpose from being processed for other purposes not compatible with the original purpose

PARSED GIS COMMAND

INFERENCE ENGINE

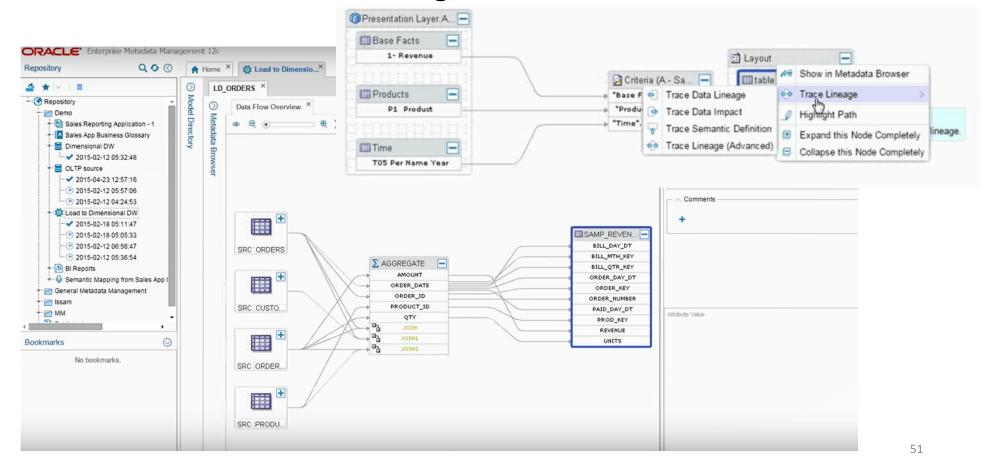
KNOWLEDGE

Conclusion:

Data lineage metadata can be used to help information system developers meet key data protection by design requirements:

- 1. Data subjects have right to access, review and rectify their personal data
- 2. Data subjects have the **right to withdraw given consent** with effect for the future and
 - Block access
 - Constrain processing and use
 - Erase their personal data
- 3. Personal data obtained for one purpose must not be processed for other purposes not compatible with the original purpose

Outlook: Commercial database management systems are beginning to include lineage metadata capabilities for tracking attribute values processed and transformed among relational database tables ...



Agenda

- ✓ Data protection by design
- System Security Plan
 - Security control inheritance
 - Team project SSP review and discussion

Agenda

- ✓ Data protection by design
- ✓ Cloud computing specifications
- Security control origination
- Team project SSP progress review and discussion

Security Control Origination

Security control "inheritance" exist when

an information system or application receives protection from security controls developed, implemented, assessed, authorized, and monitored by entities other than those responsible for the system or application

NIST SP 800-53 Revision 4

Control Origination

Many of the controls needed to protect organizational information systems are inheritable by other systems, e.g.

- Security awareness training
- Incident response plans
- Physical access to facilities
- Rules of behavior
- Public Key Infrastructure [PKI]
- Authorized secure standard configurations for clients/servers
- Access control systems
- Boundary protection
- Cross-domain solutions

Control Origination

| Control Origination (check all that apply): |
|---|
| ☐ Service Provider Corporate |
| □ Service Provider System Specific |
| ☐ Service Provider Hybrid (Corporate and System Specific) |
| □ Configured by Customer (Customer System Specific) |
| ☐ Provided by Customer (Customer System Specific) |
| ☐ Shared (Service Provider and Customer Responsibility) |
| ☐ Inherited from pre-existing FedRAMP Authorization for Click here to enter text. , Date of Authorization |

- Indicate what sections of the security control are inherited and provide a description of what is inherited
- If a entire control is inherited, it must be clear to the Assessor what is inherited
- The writer does not need to describe how the leveraged service is performing the particular function
 - That detail is found in the SSP of the leveraged system from which the control is inherited

If a policy has been published and is referenced as is the basis for the implementation of the inherited security control, make sure that published document is provided as an attachment, or a supporting artifact with the SSP when submitted for FedRAMP review

https://www.fedramp.gov/weekly-tips-cues-february-15-2017/

Control Origination

| IA-5 (3) | Control Summary Information | | | |
|---|-----------------------------|--|--|--|
| Responsible Role: | | | | |
| Parameter IA-5(3)-1: | | | | |
| Parameter IA-5(3)-2: | | | | |
| Parameter IA-5(3)-3: | | | | |
| Parameter IA-5(3)-4: | | | | |
| Implementation Status (check all that apply): Implemented Partially implemented Planned Alternative implementation Not applicable | | | | |
| Control Origination (check all that apply): Service Provider Corporate Service Provider System Specific Service Provider Hybrid (Corporate and System Specific) Configured by Customer (Customer System Specific) Provided by Customer (Customer System Specific) Shared (Service Provider and Customer Responsibility) Inherited from pre-existing FedRAMP Authorization for Click here to enter text., Date of Authorization | | | | |

Agenda

- ✓ Data protection by design
- ✓ System Security Plan
 - ✓ Cloud computing specifications
 - ✓ Security control inheritance
 - Team project SSP review and discussion