ALYSSA PUGH

How to Write a Policy

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Disclaimer

A FEW THINGS FIRST

This presentation is for information only.
Evaluate risks before acting based on ideas from this presentation.

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Alyssa Pugh

CISM, SECURITY+
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Agenda

HERE'S THE PLAN

- Policy Theory
- Policy Practice
  - Choose a Topic
  - Research
  - Draft Policy Sections
  - Get it Approved
- Questions & Answers

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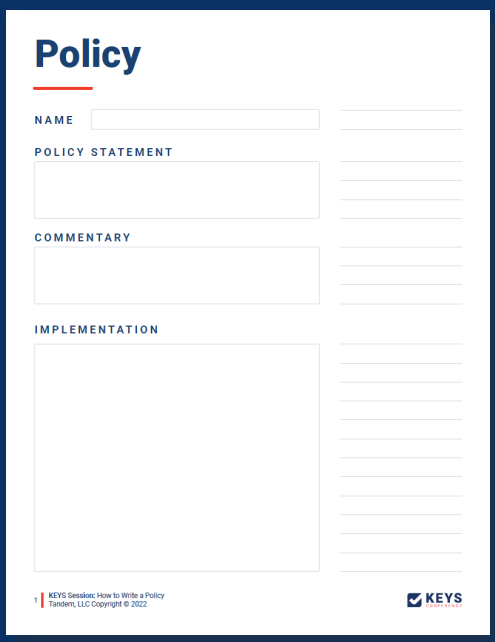

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Policy Theory

WHAT'S IN A POLICY?

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TANDEM POLICIES DOCUMENT INTRODUCTION

"Policies are a series of statements, rules, and assertions which define the organization's governance structure."

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How Does it Do That?

1

Expected Behavior

(how you act)

2

Required Actions

(what you do)

3

Prohibited Activities

(what you do not do)

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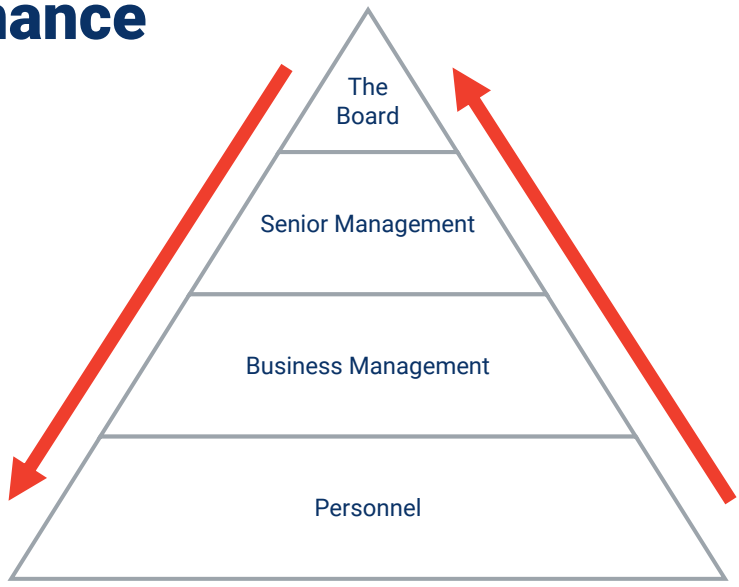
Governance



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Policy Sections

1. Name
2. Policy Statement
3. Commentary
4. Implementation
5. Related Policies
6. Responsibility
7. Review Items

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Policy

NAME

A brief title.

POLICY STATEMENT

A summary.
This is the policy.

COMMENTARY

The context.
Justify and define.

IMPLEMENTATION

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IMPLEMENTATION

How you do the policy. Standards or procedures.

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RELATED POLICIES

1.
2.
3.
4.
5.
6.
7.

Topics related to this policy.

RESPONSIBILITY

Who makes it all happen.

REVIEW ITEMS

WHO?	WHAT?	HOW OFTEN?

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REVIEW ITEMS

WHO?	WHAT?	HOW OFTEN?

Prove the policy works.

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What NOT to Do

IT'S A LONG LIST...BUT HERE'S SIX.

- Too Broad
- Too Specific
- Missing Key Words
- Duplicate Content
- Impossibly Formatted
- Not Followed

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TAKEAWAY

Policies are your friends. Help them help you.

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Policy Practice

TIME TO ROLL UP YOUR SLEEVES

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Disclaimers

A FEW MORE THINGS

Get up and stretch sometimes.
Writing a policy can cause muscle and brain cramps if not managed appropriately.

Do not throw your controller at the screen.
I borrowed this from Nintendo, but it is a good rule to live by, especially when writing policies.

You might not need the policy we write today.
Your organization's size, complexity, systems, and processes will determine what policies you need.

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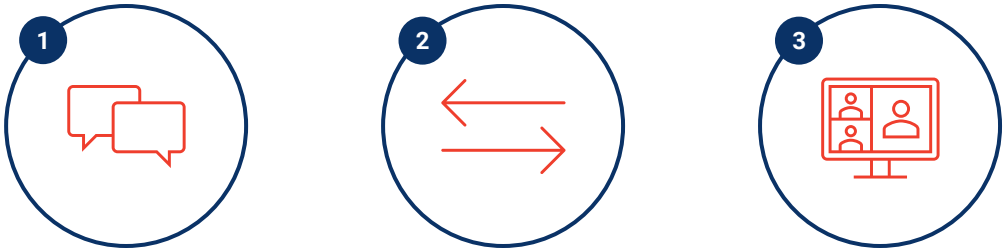
Pick a Policy

CHOOSE YOUR OWN ADVENTURE!



Instant Messaging Policy

File Exchange Policy

Video Conferencing Policy

Cloud Computing Policy

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Video Conferencing Policy

YOU CHOSE... WISELY.

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Examples

Zoom

Google Meet

Webex

Teams

A video conferencing application allows users to host, join, and record virtual meetings, including audio, video, and text communications.

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Policy

NAME Video Conferencing

A brief title.

POLICY STATEMENT

A summary.
This is the policy.

COMMENTARY

The context.
Justify and define.

IMPLEMENTATION

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Policy

NAME Video Conferencing

A brief title.

POLICY STATEMENT

Use only approved video conferencing applications for virtual meetings in which organization and/or customer/member data may be discussed.

A summary.
This is the policy.

COMMENTARY

The context.
Justify and define.

IMPLEMENTATION

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Policy

NAME Video Conferencing

A brief title.

POLICY STATEMENT

Use only approved video conferencing applications for virtual meetings in which organization and/or customer/member data may be discussed.

A summary. This is the policy.

COMMENTARY

1. Define "Video Conferencing."
2. Describe the benefits and risks.
3. Explain how the policy helps.

The context. Justify and define.

IMPLEMENTATION

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IMPLEMENTATION

How you do the policy. Standards or procedures.

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What Should You Do?

LOOK INSIDE YOUR HEART... AND THESE DOCUMENTS.

- FFIEC IT Examination Handbook (“IT Booklets”)
- FFIEC Cybersecurity Assessment Tool (CAT)
- NIST Cybersecurity Framework (CSF)
- NIST SP800-53 Controls
- CIS Controls (v8.0)
- CISA Tips and Alerts
- Agency IT Examination Procedures (e.g., FDIC InTREx Program)
- Agency Guidance (e.g., FDIC FILs; FRB SR Letters; NCUA SLs; OCC Bulletins)

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Web Search

SECRETS OF A POLICY WRITER

[Topic] site:“.gov”

Video Conferencing Guidance site:“.gov”

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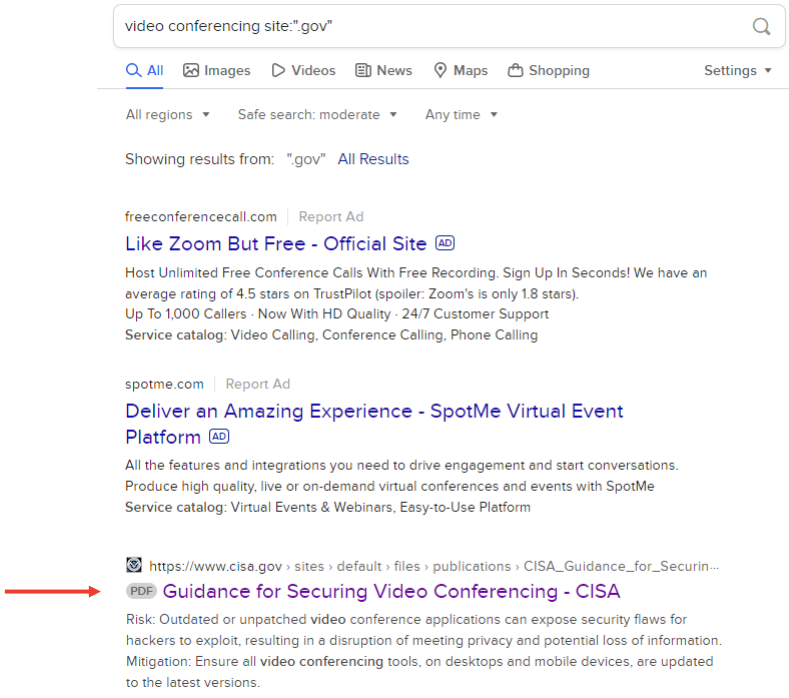

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CISA

Guidance for Securing Video Conferencing

Read the Guidance

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IMPLEMENTATION

1. Determine data to be stored, processed, or transmitted by video conferencing application.
2. Select a reputable service provider and perform adequate due diligence.
3. Block unauthorized video conferencing applications.
4. Train staff and include in acceptable use.
5. Follow security best practices, as defined by other policies, based on sensitivity of data.

How you do the policy. Standards or procedures.

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RELATED POLICIES

1. Access Control
2. Data Backup
3. Data Retention & Destruction
4. Encryption
5. IT Asset Management
6. System Hardening
7. Vendor Management

Topics related to this policy.

RESPONSIBILITY

Who makes it all happen.

REVIEW ITEMS

WHO?	WHAT?	HOW OFTEN?

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RELATED POLICIES

1. Access Control
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Topics related to this policy.

RESPONSIBILITY *[[Name]]*

Who makes it all happen.

REVIEW ITEMS

WHO?	WHAT?	HOW OFTEN?

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REVIEW ITEMS

WHO?	WHAT?	HOW OFTEN?
Audit Committee	Review the use of video conferencing apps.	Annually
Vendor Management	Review updated service provider due diligence.	Annually
Security Committee	Review network logs to verify acceptable use.	Annually
Security Committee	Review security awareness training results and AUPs.	Annually

Prove the policy works.

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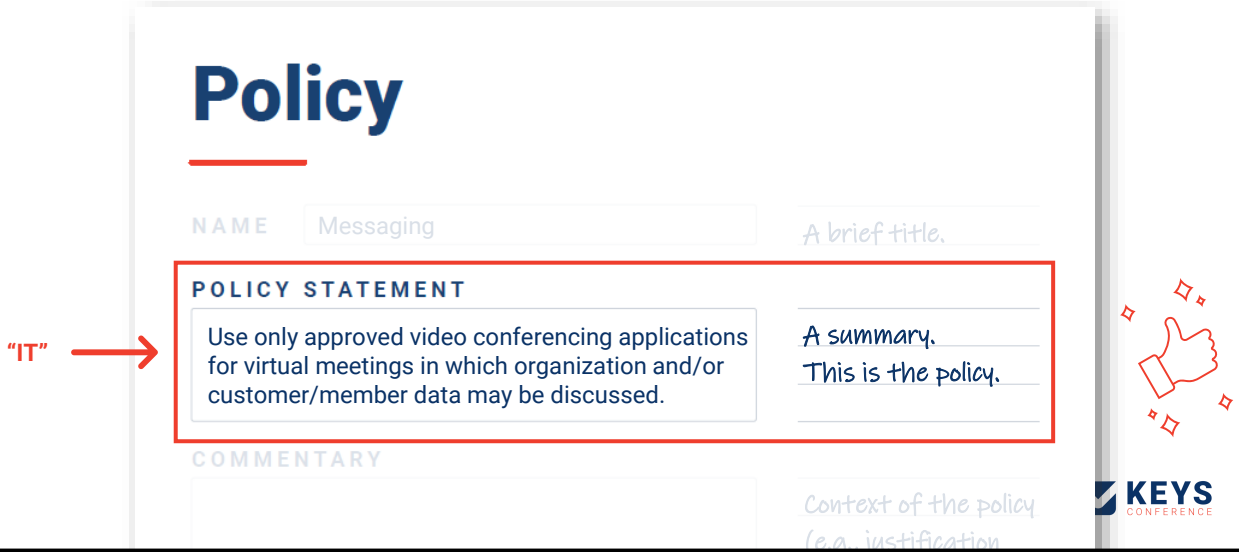
Get it Approved!



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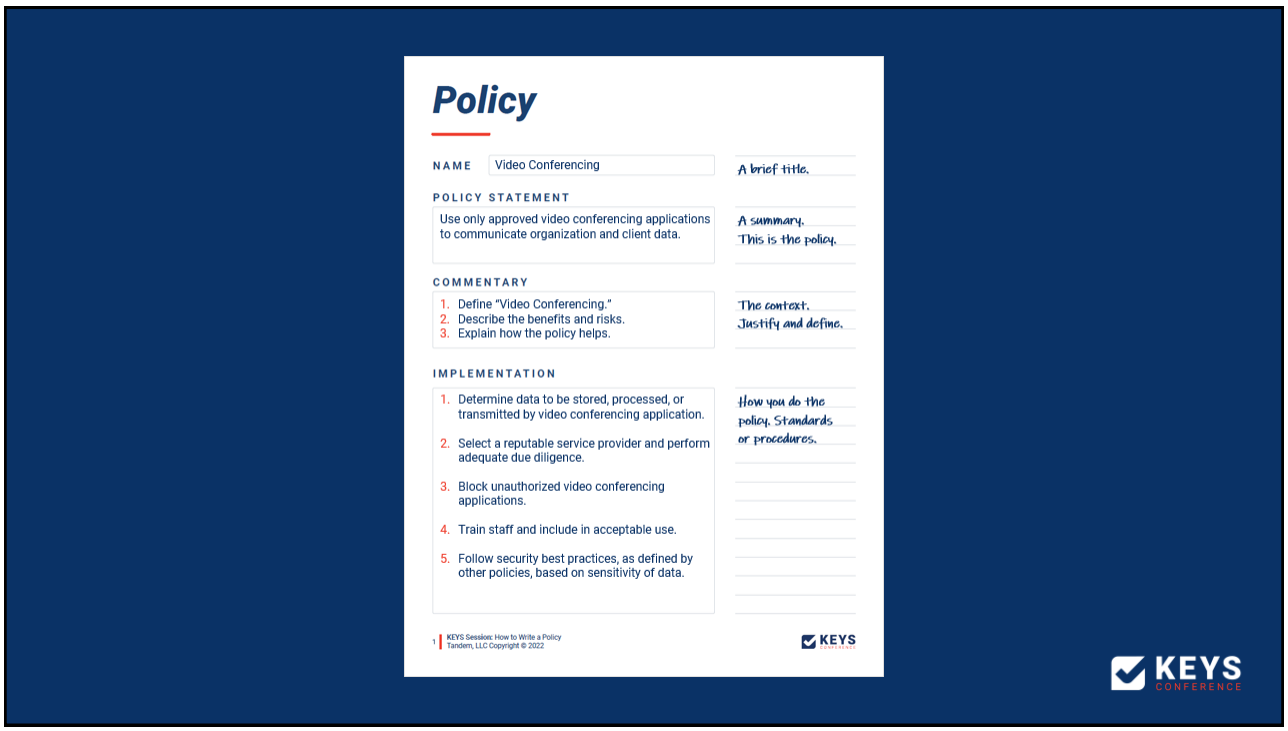

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TAKEAWAY

The best policies are the ones which everyone can understand and follow.

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DON'T FORGET!
Fill out the survey to get your sticker!

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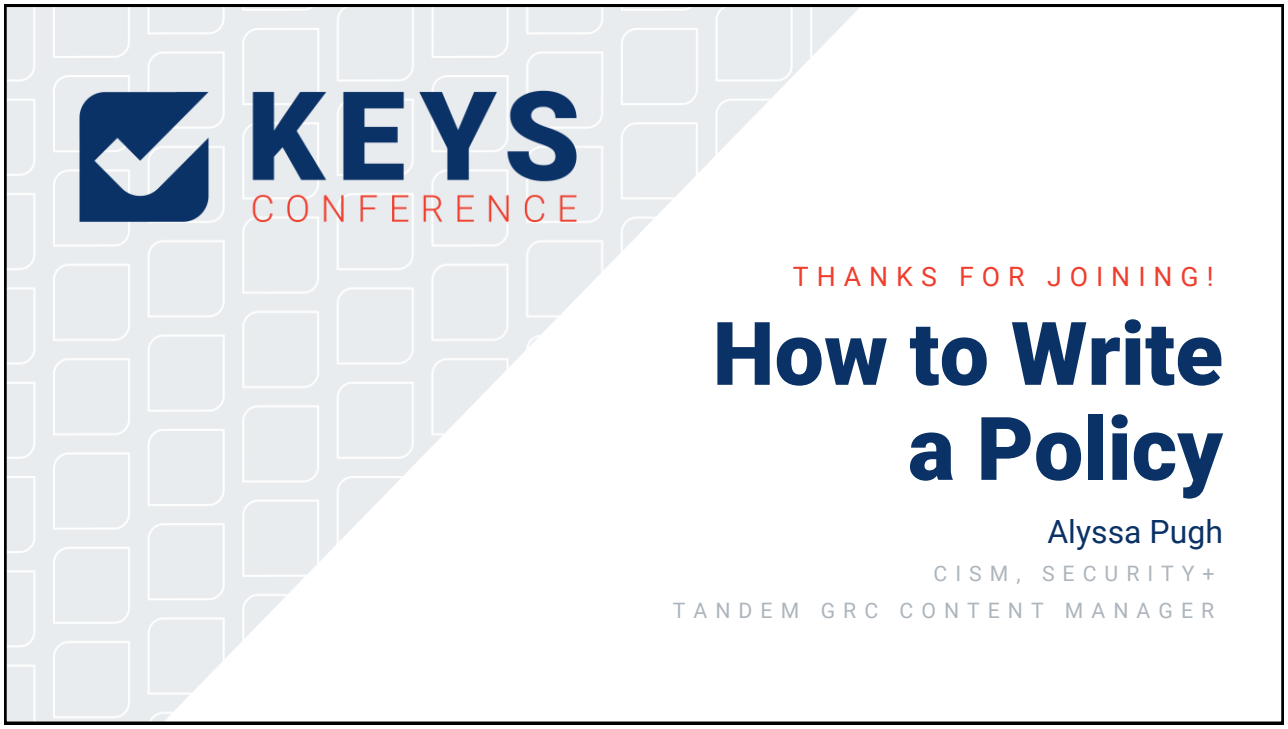
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THANKS FOR JOINING!
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Upcoming Sessions

TANDEM

Creating an Effective Incident Response Plan

Lindsey McReynolds, Tandem

RISK & COMPLIANCE

CoNetrix Security Auditors: A Panel Discussion

Mark Faske, Bret Mills, Mark Riff, & Ty Purcell, CoNetrix Security

CYBERSECURITY

Understanding the Value of Your SIEM and SOC

Mike Richline, CoNetrix Technology

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