

1

---

---

---

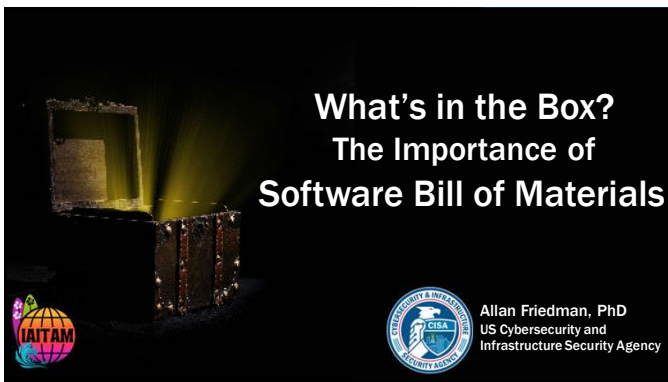
---

---

---

---

---



2

---

---

---

---

---

---

---

---



3

---

---

---


---

---

---

---

---



## Key takeaways

Understanding what's in our software and how it was made is a critical part of the software process. This is called a Software Bill of Materials (SBOM).

Why would anyone buy, use, or manage software without knowing what's in it or knowing how its made?

Transparency in all software is coming—and it can help you for your roles in managing assets and risk.

4

---

---

---

---

---

---

---

---

## Paying attention or getting a proper coffee

- Why are ingredients important?
- Software risks – security, but so much more!
- What is an SBOM?
- Why is SBOM and why you should care
- Is someone going to make me do this?
- Summary – the slides to take pictures of





5

---

---

---

---

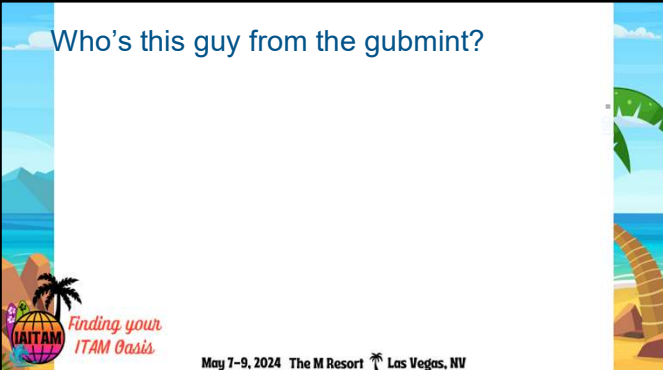
---

---

---

---

## Who's this guy from the gubmint?



*Finding your ITAM Basis*

May 7–9, 2024 The M Resort Las Vegas, NV

6

---

---

---

---


---

---


---

---

Who's this guy from the gubmint?



I'm from the government, and I'm here to help...

 Finding your ITAM Oasis

May 7-9, 2024 The M Resort Las Vegas, NV

7

---

---

---

---

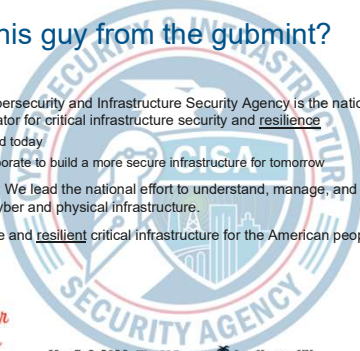
---

---


---

---

Who's this guy from the gubmint?



- The Cybersecurity and Infrastructure Security Agency is the national coordinator for critical infrastructure security and resilience.
- Defend today.
- Collaborate to build a more secure infrastructure for tomorrow.
- Mission: We lead the national effort to understand, manage, and reduce risk to our cyber and physical infrastructure.
- A secure and resilient critical infrastructure for the American people.

 Finding your ITAM Oasis

May 7-9, 2024 The M Resort Las Vegas, NV

8

---

---

---

---

---

---

---

---

An analogy



9

---

---

---

---

---

---

---

---

## An analogy - Benefits



Transparency in food is a critical part of health, lifestyle, and management of our daily life



10

---

---

---

---

---

---

---

---

## An analogy - Limits



This will not by itself

- Prevent allergens
- Keep you on a diet
- Enforce dietary rules

(and you need to know what words mean)



11

---

---

---

---

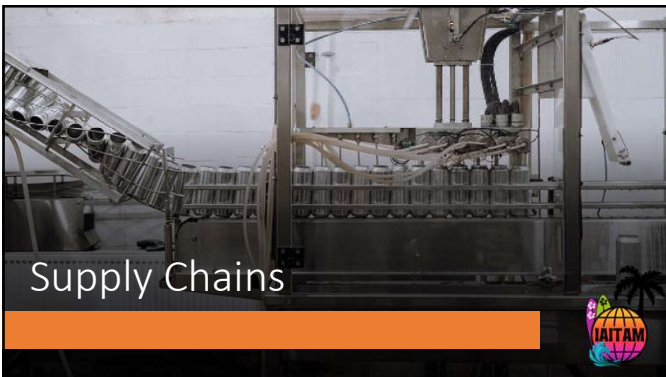
---

---

---

---

## Supply Chains



12

---

---

---

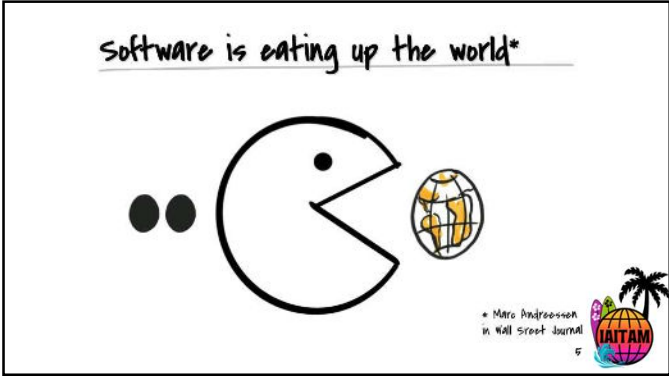
---

---

---

---

---



13

---

---

---

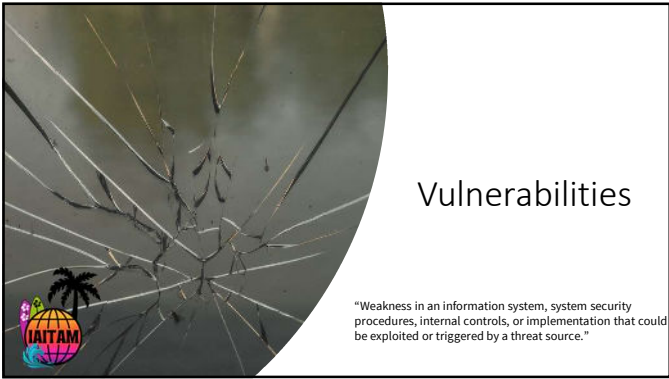
---

---

---

---

---



14

---

---

---

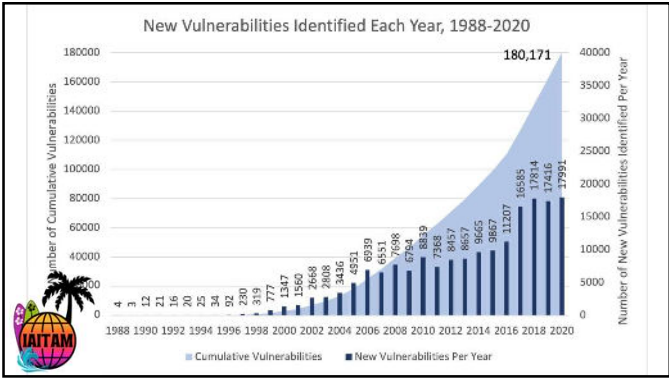
---

---

---

---

---



15

---

---

---

---

---

---

---

---



16

---

---

---

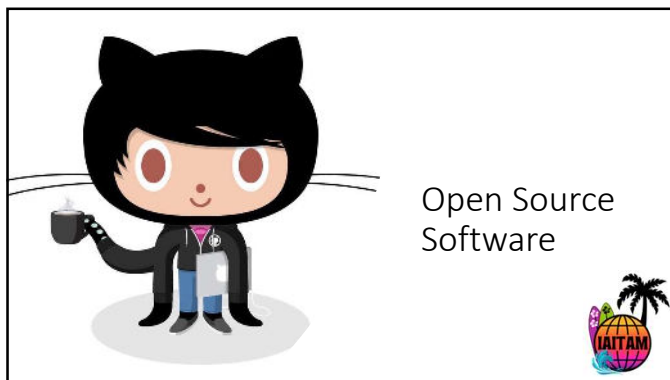
---

---

---

---

---



17

---

---

---

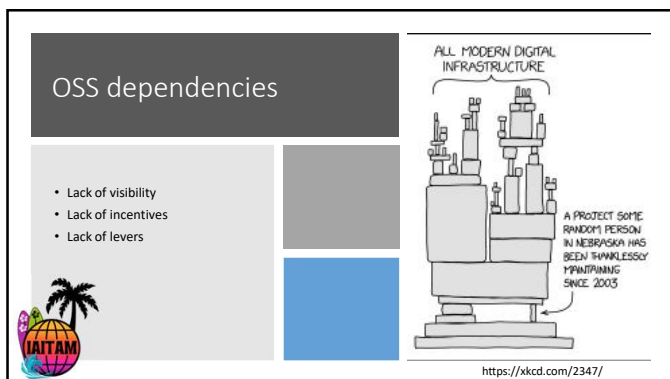
---

---

---

---

---



18

---

---

---

---

---

---

---

---





19

---

---

---

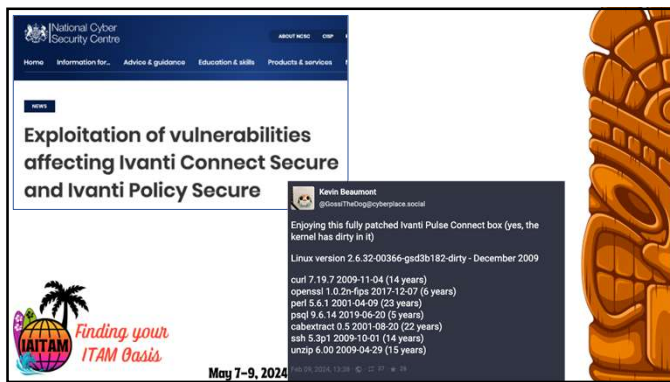
---

---

---

---

---



20

---

---

---

---

---

---

---

---



21

---

---

---

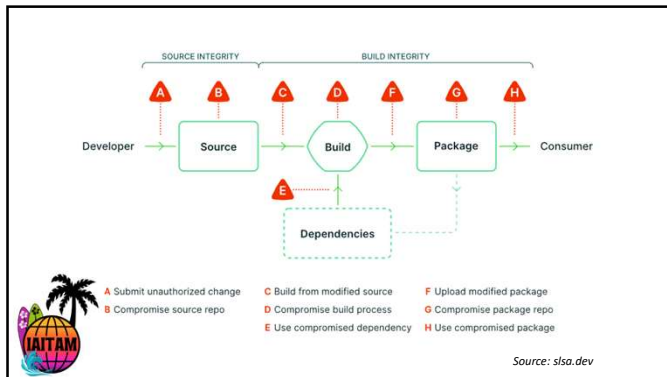
---

---

---

---

---



22

---

---

---

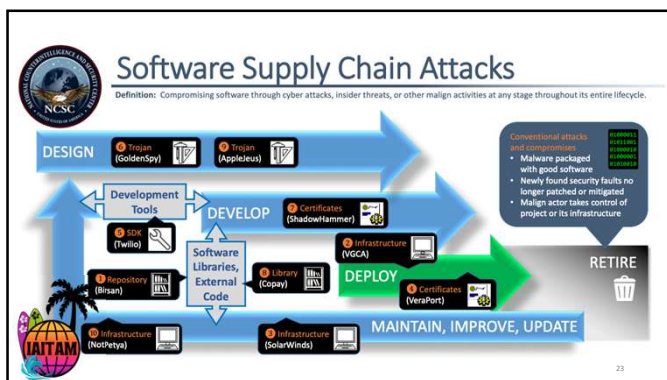
---

---

---

---

---



23

---

---

---

---

---

---

---

---



24

---

---

---

---

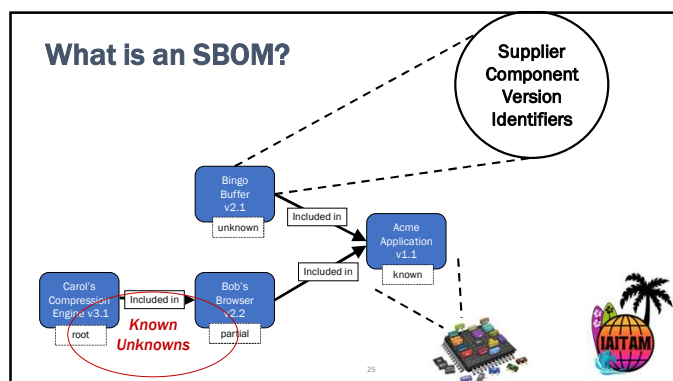
---

---

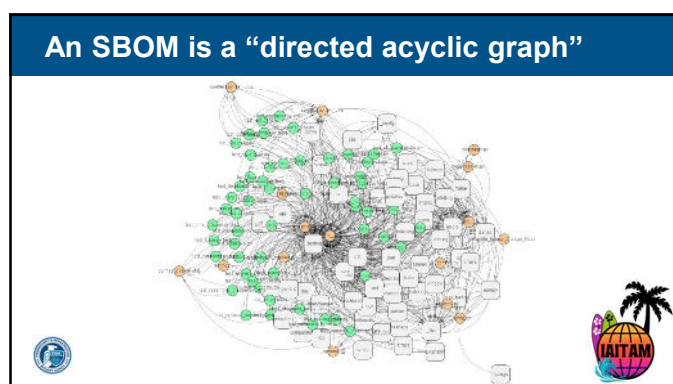
---

---

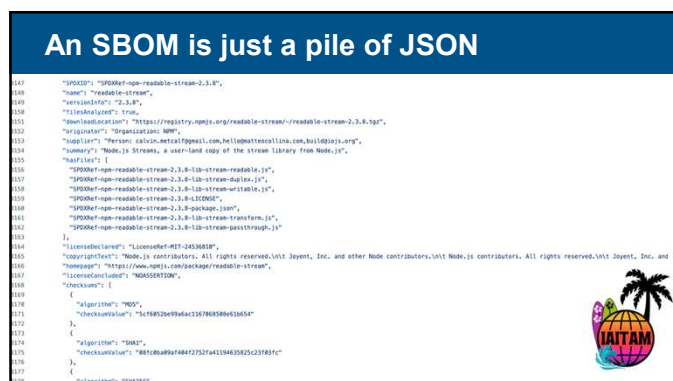




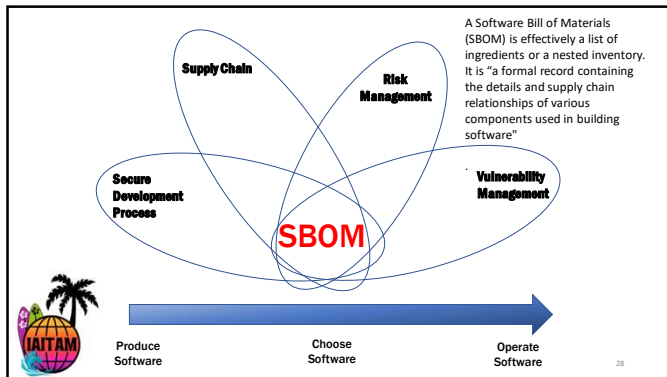
25



26



27



28

---

---

---

---

---

---

---

---



29

---

---

---

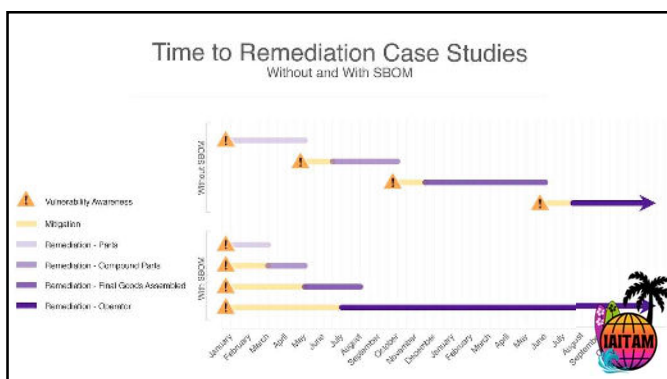
---

---

---

---

---



30

---

---

---

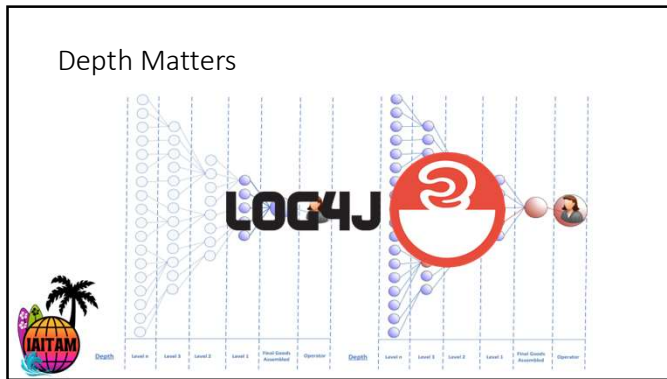
---

---

---

---

---



31

---

---

---

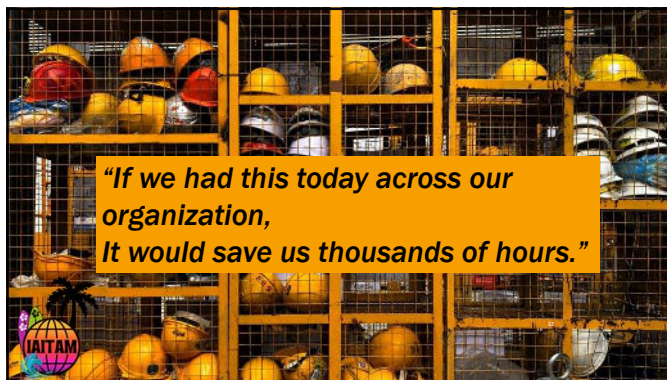
---

---

---

---

---



32

---

---

---

---

---

---

---

---



33

---

---

---

---

---

---

---

---



34

---

---

---


---

---


---

---

**Executive Order 14028 (May 12, 2021)**  
**"Improving the Nation's Cybersecurity"**



- "The trust we place in our digital infrastructure should be proportional to how trustworthy and transparent that infrastructure is..."
- Uses government purchasing requirements as a lever
- Focus is on what is expected of software providers
- **Section 4: Enhancing Software Supply Chain Security.**
  - Separate build environments
  - MFA requirements
  - Documenting dependencies
  - Vulnerability management
  - SBOM
  - "attesting to conformity with secure software development practices"



35

---

---

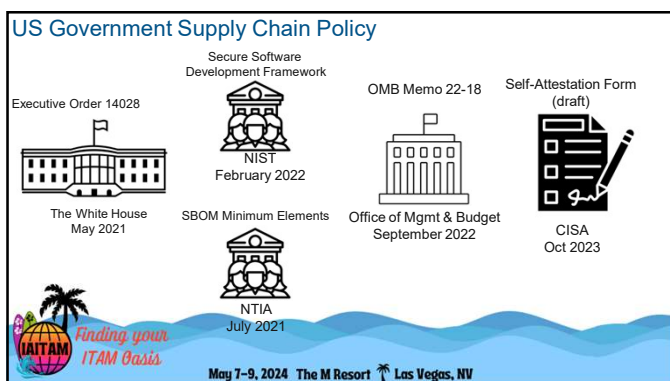
---

---

---

---

---



36

---

---

---

---

---

---

---

## OMB Memo 22-18

- "Enhancing the Security of the Software Supply Chain through Secure Software Development Practices"
- Initial implementation based on NIST 800-218 "Secure Software Development Framework"
- Sets the model of "self-attestations"
- Target is government agencies
- Agencies \*may\* ask for an SBOM
- CISA tasked to update SBOM "minimum elements" as needed.



37

---

---

---

---

---

---

---

---

## Self-Attestations

- Published by CISA in March 2024
  - Scope: new, proprietary software sold to the US government
  - Form that each vendor must sign for each product
  - Goes into effect Fall 2024
- Includes claims about
  - Secure development and build environments
  - Multi factor authentication
  - Continuous monitoring
  - Automated supply chain monitoring tools
  - Automated vulnerability management tools
- "The software producer maintains provenance for internal code and third-party components incorporated into the software to the greatest extent feasible"
- [cisa.gov/secure-software-attestation-form](https://cisa.gov/secure-software-attestation-form)



Allen.Friedman@cisa.dhs.gov  
October 3, 2023

38

38

---

---

---

---

---

---

---

---

## Medical Devices and FDA regulation

- Background
  - Explicitly mentioned in Congressional Healthcare Industry Cybersecurity Task Force (2017)
  - Idea raised in FDA 2018 Draft Pre-Market Guidance
  - Authorities for cybersecurity granted to FDA in FY 2023 Omnibus
    - Explicit SBOM requirements for "cyber devices"
- Submission Requirements for Devices
  - Must give FDA an SBOM if you qualify as a "cyber device"
  - Recommend an SBOM for non-Cyber Devices
  - "Refusal to Accept"
    - Is the submission complete
    - Will work with MDMs until Oct 1, and then may reject incomplete submissions
  - Supports the industry-recognized machine-readable formats (No PDFs)
- Status: Finalized Guidance still forthcoming
  - 2022 Draft Guidance offers details, including SBOM
- International Medical Device Regulators Forum



39

---

---

---

---

---

---

---

---



European Policies

Network and Information Systems Directive 2 (NIS2 2022)

Assess the risks associated with the products, services, and supply chains of third-party suppliers

Cyber Resilience Act (CRA 2024?)

Vulnerability Disclosure

SBOM requirements  
Must have an SBOM  
Does not have to be public  
Available to the market surveillance auth

40

---

---

---

---

---



---

---

---

**Federal Acquisition Regulation (FAR)**

- New rules proposed in Oct 2023 for public comment 2021-017
- *"The Contractor shall maintain, and upon the initial use of such software in the performance of this contract, provide or provide access to the Contracting Officer a current SBOM for each piece of computer software used in performance of the contract. Each SBOM shall be produced in a machine-readable, industry-standard format and shall comply with all of the minimum elements..."*

41

---

---

---


---

---

---

---


---



**Red-teaming SBOM**  
**Why not do this?**

May 7-9, 2024 The M Resort Las Vegas, NV

*Finding your ITAM Basis*



42

---

---

---

---

---

---

---

---





43

---

---

---

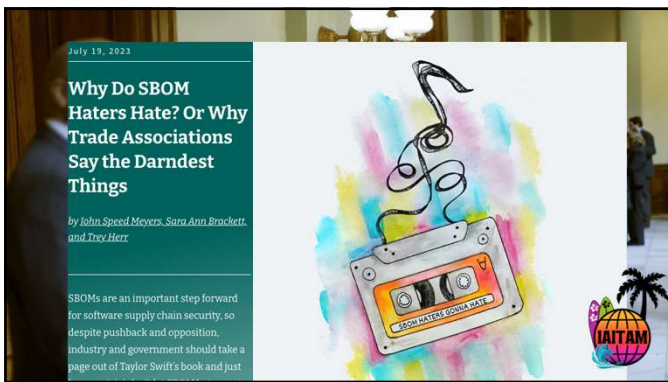
---

---

---

---

---



44

---

---

---

---

---

---

---

---



45

---

---

---

---


---

---

---

---

Software by any other name...



There are only two hard things in Computer Science: cache invalidation and naming things."

- attributed to Phil Karlton

46

---

---

---

---


---

---

---

---

Software by any other name...



There are only two hard things in Computer Science: cache invalidation and naming things."

- attributed to Phil Karlton

47

---

---

---

---

---

---

---

---

Hardware Bill of materials



48

---

---

---

---

---

---

---

---

## Summary: Why the ITAM Community should look *inside* the box with SBOM

- Improved visibility – what software do you actually have?
- Maintenance – plan for EOL in advance
- License compliance – direct and secondary risks
- Vulnerability management – risks in the supply chain
- Decision-making – more details about SW composition
- Cost optimization – unused or duplicate components
- Compliance – gubmint's gonna gubmint



49

---

---

---

---

---

---

---

---

## Revisiting takeaways

Understanding what's in our software and how it was made is a critical part of the software process

Why would anyone buy, use, or manage software without knowing what's in it or knowing how it's made?

Transparency in all software is coming—and it can help you for your roles in managing assets and risk.



allan.friedman@cisa.dhs.gov  
SBOM@cisa.dhs.gov  
@allanfriedman #SBOM



50

---

---

---

---

---

---

---

---

## IAITAM ACE

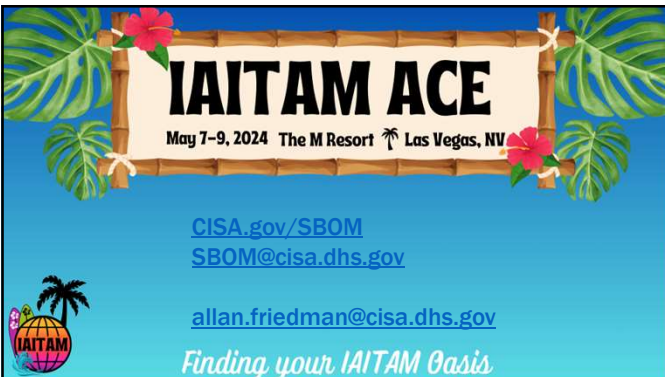
May 7-9, 2024 The M Resort Las Vegas, NV

[CISA.gov/SBOM](https://CISA.gov/SBOM)

[SBOM@cisa.dhs.gov](mailto:SBOM@cisa.dhs.gov)

[allan.friedman@cisa.dhs.gov](mailto:allan.friedman@cisa.dhs.gov)

*Finding your IAITAM Oasis*



51

---

---

---

---

---

---

---

---