Build with OSCAL: the case for adoption and beyond

Actions Beyond Words: Automating Audits for Streamlined Cybersecurity Compliance in Europe, 23 April 2025 Fritz Kunstler, Principal Engineer, AWS





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circa 1998

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Startup challenges (1998-99)

Build expert system that tells customer how to interconnect consumer electronics components and recommends cables.

Consumer sees this as overhead; just wants it to work.

Complex, variable hardware-stack with components from potentially dozens of makers

Paper documentation of components

- Information silos (consumers, customers, makers)
- Lossy translation to English
- Inconsistent terminology, structure, detail between makers
- Subject matter experts (SMEs) required to manually extract data & maintain it in digital format







Today in security governance, risk, and compliance (GRC)

Or, what does any of that have to do with OSCAL?

Parallels

Challenges of failed startup, 1999

- Complex tech-stack from dozens of CE makers
- Documentation inconsistencies (structure, terms, details)
- SMEs required to translate requirements to customer environment
- Siloed information
- Manual mappings done by humans using spreadsheets

Challenges of security GRC, 2025

- Complex tech-stack from cloud providers, ISVs, etc.
- 150+ frameworks in traditional doc formats w/ inconsistent structure, terms, details
- SMEs required to translate requirements to customer environment
- Siloed information
- Manual mappings done by humans using spreadsheets

Compliance tooling

92% of big four auditors and 74% of non-big 4 auditors "Always" or "Often" using spreadsheets for Risk Assessment and Audit Planning

Almost 90% of leaders are interested in the integration of Al tools by providers of risk and compliance solutions. (Moody's Navigating the Al Landscape: Insights From Compliance And Risk Management Leaders)

38% of compliance leaders cite inefficient or manual compliance processes as their most significant worry. (NorthRow State of Compliance Trends Report 2024)

https://drata.com/blog/compliance-statistics

Current state (2025)

GRC approach

- Traditional doc formats for information exchange
- Siloed data in GRC tools
- Manual mappings done by humans in spreadsheets
- Evidence-gathering and analysis hand-done by SMEs

Builder approach

- Cloud, IoT, etc.
- Everything has an API
- Increasingly rapid SDLCs
- CI/CD automation
- AI-driven development

Compliance overhead

On average, 25% of business revenue is spent on compliance costs. 18% of businesses estimated that more than 50% of revenue is spent on compliance costs. (NorthRow State of Compliance Trends Report 2023)

74% of organizations state that compliance is a burden.

Time spent on compliance:

- 25% of organizations spend less than 1,000 hours/year.
- 35% spend 1,000 to 4,999 hours;
- 20% spend 5,000 to 9,999 hours;
- remaining 20% spend10,000+ hours/year.

https://drata.com/blog/compliance-statistics

Extending the analogy

Status quo

OSCAL



Get started with OSCAL

OSCAL is the de facto standard for security data interchange between enterprises and tools.



OSCAL use-cases at AWS

2022 – <u>AWS achieves the first OSCAL</u> format system security plan submission to FedRAMP



2024 – <u>Implementing a compliance and</u> reporting strategy for NIST SP 800-53 Rev. 5



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OSCAL use-cases at AWS

2025

<u>Using OSCAL to express Canadian</u> <u>cybersecurity requirements as</u> <u>compliance-as-code</u>



OSCAL Foundation Launched to Advance the Development and Adoption of Standards to Automate Security Assessments



Sample objective (OKR) for your organization

Revolutionize internal security control management

- 1. Launch OSCAL-based, agentic-AI workflow for security control mapping and catalog management by Q2 2026
- 2. Integrate 3+ enterprise stakeholder groups outside of Compliance org by Q3 2026
- 3. Achieve 85% accuracy verified by formal methods in automated, fine-grained, control mapping by Q4 2026
- 4. Eliminate internal control framework in favor of auto-generated [NIST 800-53 profile | ISO 27001 | ...]
- Reduce cost of control catalog maintenance and framework mapping by at least 50% compared to current methods by Q1 2027

Vision: fully-integrated, end-toend compliance automation – based on OSCAL – with human intervention only where highjudgement is needed

Request for input

AWS wants to hear from you. Tell us what OSCAL services or features would be most valuable to your organization.

Schedule a conversation with me using this QR code:





Thank you!

