

Conceptualizing, developing, implementing, and maintaining an effective security program is a critical necessity for organizations to successfully achieve compliance with internal and regulatory controls. An effective security program is also paramount in an organization's ability to meet contractual requirements with customers. Once initial compliance is achieved for the adopted, in-scope controls, the perpetual focus should be shifted to maintaining continuous compliance.

Security program shortcomings or overall control failures will result in a negative impact on an organization's security and compliance posture. There are many reasons a security program may come up short or fail entirely. Each of these reasons is likely to affect an organization's reputation, customer relationships, and regulatory compliance.

To avoid critical security program pitfalls, consider the following tips. They will help you align your security program with necessary control requirements so that you are ready to pass audits, exams or assessments with ease.

- 1. Don't wait for perfection. Don't wait until your security program plan is perfect before your implement it. If you wait until you have a perfect plan you may never finish. The plan should be expected to be a living document that will mature over time, as incremental improvements are made.
- **2. Outline policies by control family**. When building your plan, developing a single

policy for a dedicated family of controls identified by your selected framework will streamline your security program. This will help support policy reviews, content updates and policy acknowledgements.

3. Encourage
multi-department
engagement. It's
valuable to
encourage all
personnel to provide
feedback on your
security
program.
Certainly, some
controls must be
followed verbatim,

however there are

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oftentimes opportunities to tailor controls to align with how specific departments operate. Engaging department stakeholders early will help ensure active participation in the plan.

- **4. Consider a vCISO.** Not every company has the means, or access, to hire a full-time Chief Information Security Officer (CISO) to oversee the direction and strategy of the security plan. If your organization falls into this category, consider engaging a virtual CISO (vCISO) that shares time with multiple organizations. This can be a very costeffective way to have a CISO on staff without paying a full-time CISO salary.
- 5. Streamline the process using a SaaS compliance portal. Organizing your compliance tasks, artifacts and managing your control status is a complex process. Consider leveraging a web-based security assessment portal or service which enables realtime updates to be made to security control status and supporting artifacts. This helps ensure that you are always prepared for any review. It also provides you with an op-

portunity to support control reviews over the course of a year, instead of within a two -to-three-week period. And it enables continuous monitoring while reducing overhead associated with manual monitoring activities and captures program documentation and supporting files so that they are available as needed in perpetuity.

No organization should implement security controls simply to pass an audit, exam, or assessment. Your organization should pass audits, exams, or assessments because of the security controls that have been implemented to support, manage, and continuously improve an effective security program. By building a comprehensive security and compliance program, supported by all organizational stakeholders, you'll ensure that your organization can avoid key security pitfalls for effective alignment with your control framework.

## **READ MORE > 100 Security Program Pitfalls and Prescriptions to Avoid Them.**





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