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Comments Received :

The attestation requirement of "conditional access across the environment relevant to developing and building software in a manner that minimizes security risk" - on page 6 of the document is unclear.

First, what definition of conditional access is being utilized, some people interpret this as an IP address restriction being adequate, others say the intent is for JIT access decisions to be make based on policies. AWS provides very little information about conditional access support, therefore, is the rudimentary approach listed within their Blog concerning the EO considered adequate, or is there a broader implementation of conditional access capabilities required such as supplementing AWS w/MS Entra to provide JIT-based access control decisions?

Second, was it purposeful to not include operational supporting systems (such as for hosting a SaaS, PaaS, or IaaS) as part of the requirement by limiting it to just development and build systems? If so, why, if not further clarification would be appreciated.

Ref: https://aws.amazon.com/blogs/security/how-us-federal-agencies-can-authenticate-to-aws-with-multi-factor-authentication/