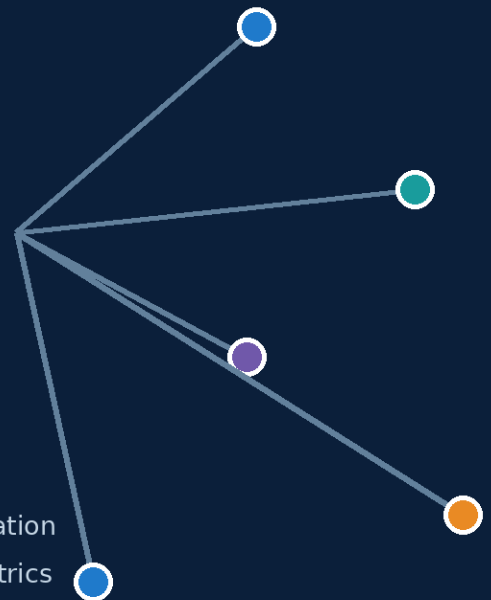


## SAAS GRC MATURITY STARTER RUNBOOK

How to assess your starting point, partner with engineers, formalize controls, and build a practical roadmap before you hire dedicated GRC support.

**PHASE 0 READINESS + 30 / 60 / 90-DAY ROADMAP**

Maturity baseline • Engineering alignment • Control implementation  
Evidence and assurance • Selective automation • Executive metrics



# START HERE HOW TO USE THIS RUNBOOK

*A client-facing starter guide for SaaS companies that need to mature GRC before they hire dedicated leadership or consulting support.*

This runbook is designed for SaaS executives, security leaders, engineering leaders, IT owners, first-time compliance managers and founders who know their governance, risk and compliance activities need more structure but are not yet ready to launch a full transformation.

It provides a practical way to establish the starting point, avoid premature automation, define a credible 90-day roadmap and begin formalizing controls with Engineering. It is intentionally more than a checklist, but it is not a substitute for a tailored risk assessment, legal interpretation, technical architecture review or certification implementation plan.

## The central idea

A SaaS company should not begin with a framework checklist or a GRC platform. It should begin with business drivers, scope, ownership, risk and the operating practices already embedded in Engineering and IT.

## Who should use it

- SaaS companies preparing for enterprise customer security expectations, SOC 2, ISO 27001 or regulated-market expansion.
- Organizations whose GRC work is distributed across Security, Engineering, IT, Legal, Sales and Operations without a single operating model.
- Companies that want to make useful progress before hiring a full-time GRC leader or engaging outside support.
- Security and engineering leaders who need a practical method for turning requirements into implementable, testable controls.

## What this guide will help you produce

| Output                              | What it gives the organization                                                                            |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------|
| <b>Maturity baseline</b>            | A realistic view of how governance, risk, controls, evidence and assurance operate today.                 |
| <b>Phase 0 decision</b>             | Agreement on whether to proceed, stabilize foundational gaps first, or obtain specialist support.         |
| <b>90-day starter roadmap</b>       | Sequenced priorities with owners, outcomes and decision points.                                           |
| <b>Engineering engagement model</b> | A repeatable way to define control outcomes without turning GRC into an architecture approval bottleneck. |
| <b>Initial control portfolio</b>    | A small, prioritized set of controls ready for implementation and testing.                                |
| <b>Leadership visibility</b>        | Metrics and governance cadences that expose risk, ownership and delivery constraints.                     |

# CONTENTS RUNBOOK STRUCTURE

*Use the sections sequentially for a new program, or begin with the maturity assessment when foundational activities already exist.*



|           |                                                   |
|-----------|---------------------------------------------------|
| <b>01</b> | Why SaaS GRC maturity matters                     |
| <b>02</b> | What mature GRC is—and is not                     |
| <b>03</b> | The SaaS GRC maturity model                       |
| <b>04</b> | Phase 0: establish the starting point             |
| <b>05</b> | Complete the readiness and maturity assessment    |
| <b>06</b> | Build the roadmap and governance structure        |
| <b>07</b> | Work with engineers without becoming a bottleneck |
| <b>08</b> | Implement controls through a repeatable lifecycle |
| <b>09</b> | Build evidence and assurance operations           |
| <b>10</b> | Govern risk, exceptions, remediation and vendors  |
| <b>11</b> | Automate selectively and safely                   |
| <b>12</b> | Measure progress and mature the program           |
| <b>13</b> | Know when specialist support is warranted         |
| <b>A</b>  | Starter templates and checklists                  |
| <b>B</b>  | A3INFOSEC engagement options                      |

# 01 WHY SAAS GRC MATURITY MATTERS

*The need for maturity usually becomes visible through business friction before it appears as a formal governance problem.*

SaaS companies rarely decide to mature GRC because the organization suddenly wants more governance. The pressure usually arrives through enterprise sales, customer assurance, audit commitments, privacy obligations, new markets, incidents, vendor dependencies, AI adoption or an engineering environment that has grown faster than its supporting processes.

## Common business triggers

| Trigger                            | What leadership experiences                                                        | Underlying GRC need                                                           |
|------------------------------------|------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <b>Enterprise sales pressure</b>   | Questionnaires, evidence requests and contract reviews delay deals.                | Governed assurance content, reliable evidence and defensible security claims. |
| <b>SOC 2 or ISO readiness</b>      | Audit preparation depends on spreadsheets, screenshots and last-minute follow-up.  | Stable scope, control ownership, operating evidence and issue management.     |
| <b>Rapid product growth</b>        | Teams implement similar controls differently across services and repositories.     | Shared control outcomes, risk-based standards and engineering integration.    |
| <b>Regulated-market expansion</b>  | Obligations are interpreted independently by Legal, Security and Product.          | Obligation inventory, decision governance and traceable implementation.       |
| <b>AI and vendor expansion</b>     | New data uses and dependencies enter the environment faster than review processes. | Risk-based intake, inventory, change governance and third-party oversight.    |
| <b>Incidents or audit findings</b> | Corrective actions are tracked, but root causes and recurring weaknesses remain.   | Consistent remediation, validation and leadership escalation.                 |

### A useful distinction

Compliance asks whether defined requirements are satisfied. Mature GRC asks whether the organization can identify material risk, make accountable decisions, operate effective controls and prove those outcomes as the business changes.

## The commercial value of maturity

- Faster and more consistent customer assurance without unsupported claims.
- Clearer control expectations for Engineering and IT.
- Less audit-season evidence collection and fewer surprise gaps.
- More disciplined risk acceptance, exception handling and remediation.
- Better executive visibility into exposure, ownership and delivery constraints.
- A stronger basis for automation because control design and evidence requirements are stable.

## 02 WHAT MATURE GRC IS—AND IS NOT

*Maturity is an operating capability, not a collection of policies, certifications or tools.*



| Mature GRC looks like                                                     | Mature GRC does not look like                                                  |
|---------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Risk determines priorities and review depth.                              | Every requirement receives the same level of effort.                           |
| Control owners understand the expected outcome and evidence.              | GRC sends framework language to engineers and waits for proof.                 |
| Exceptions have justification, safeguards, approval and expiration.       | Exceptions remain in tickets indefinitely.                                     |
| Evidence is designed into the control and reviewed for quality.           | Screenshots are collected only when an auditor asks.                           |
| Automation routes failures to accountable owners and preserves decisions. | A platform reports green checks without validating scope or control operation. |
| Metrics expose exposure, aging and decision delay.                        | Dashboards count tasks without showing risk.                                   |

### Six operating capabilities to establish

1. Governance: sponsorship, ownership, decision rights and escalation.
2. Risk management: consistent assessment, treatment and acceptance.
3. Control operations: defined outcomes, implementation, testing and improvement.
4. Evidence and assurance: reliable proof for leadership, customers and auditors.
5. Issue governance: exceptions, findings, remediation and closure validation.
6. Integration and scale: embedded workflows, selective automation and useful metrics.

#### Do not confuse activity with maturity

A company may complete hundreds of questionnaires, hold several certifications and operate a GRC platform while still depending on informal ownership, stale evidence and unsupported risk decisions.

## 03 THE SAAS GRC MATURITY MODEL

Use the model to identify the organization's actual operating stage—not the stage leadership hopes it has reached.

### THE SAAS GRC MATURITY PATH



Do not automate a reactive program. Stabilize ownership, control design and evidence first.

| Stage                 | Primary characteristics                                                                        | Immediate priority                                               |
|-----------------------|------------------------------------------------------------------------------------------------|------------------------------------------------------------------|
| <b>1. Reactive</b>    | Work is triggered by audits, sales requests or incidents. Ownership and evidence are informal. | Stabilize scope, sponsorship, ownership and critical gaps.       |
| <b>2. Defined</b>     | Policies, controls and processes exist, but interpretation and execution vary.                 | Standardize control records, evidence and decision rules.        |
| <b>3. Operational</b> | Controls run on a cadence with assigned owners, evidence and issue tracking.                   | Improve testing, governance and consistency across environments. |
| <b>4. Integrated</b>  | GRC requirements are embedded in engineering, procurement, IT and change workflows.            | Increase risk-based automation and cross-functional metrics.     |
| <b>5. Adaptive</b>    | The program responds to product, architecture, threat and regulatory change.                   | Continuously reassess, optimize and anticipate emerging risk.    |

### How to use the maturity model responsibly

- Score each domain based on observable practices and evidence, not policy language alone.
- Expect different domains to sit at different stages. TPRM may be defined while audit readiness is operational.
- Prioritize material gaps; do not make “level five” the immediate target for every process.
- Reassess after major product, architecture, regulatory, customer or organizational changes.

## 04 PHASE 0: ESTABLISH THE STARTING POINT

A roadmap should begin only after the organization has agreed on why GRC maturity matters, what is in scope and what capacity exists to execute.

### PHASE 0: ESTABLISH THE STARTING POINT



Phase 0 prevents a generic roadmap from becoming a disconnected compliance checklist.

### Phase 0 outputs

| Output                           | Questions it must answer                                                                          |
|----------------------------------|---------------------------------------------------------------------------------------------------|
| <b>Business-driver statement</b> | What business outcome is being protected or enabled?<br>Why now?                                  |
| <b>Scope statement</b>           | Which products, legal entities, systems, data, environments and obligations are included?         |
| <b>Readiness decision</b>        | Is there an executive sponsor, program owner, engineering participation and remediation capacity? |
| <b>Maturity baseline</b>         | Where do governance, risk, controls, evidence and assurance currently operate?                    |
| <b>Priority gap register</b>     | Which gaps create material customer, regulatory, security, operational or audit exposure?         |
| <b>Roadmap decision</b>          | Proceed, complete foundational stabilization first, or obtain targeted specialist support?        |

### Minimum prerequisites before execution

- An executive sponsor who can resolve ownership and priority conflicts.
- A named program owner with time and authority to coordinate work.
- A preliminary view of customer commitments, legal obligations and target frameworks.

- An agreed product and technology scope.
- Engineering, Security, IT, Legal, Procurement and business points of contact.
- Access to policies, prior audits, customer commitments, architecture information and existing evidence.
- Capacity to remediate at least the highest-priority findings.

### Leadership decision gate

Do not launch a broad roadmap when the organization cannot assign owners or fund remediation. In that situation, Phase 0 should produce an executive decision package—not an unrealistic implementation schedule.

## What leadership should approve at Phase 0

| Decision                  | Required outcome                                                                                        |
|---------------------------|---------------------------------------------------------------------------------------------------------|
| <b>Business objective</b> | Agreement on the customer, growth, regulatory, security or operational result the program must support. |
| <b>Scope boundary</b>     | Products, legal entities, environments, data and obligations included in the initial roadmap.           |
| <b>Ownership</b>          | Executive sponsor, program owner, control owners and escalation authority.                              |
| <b>Risk posture</b>       | Material risks that require treatment now and risks leadership is prepared to accept temporarily.       |
| <b>Execution model</b>    | Internal ownership, targeted outside support, expected capacity and the date for roadmap approval.      |

# 05 COMPLETE THE READINESS AND MATURITY ASSESSMENT

Use evidence-based questions to determine what can be launched now and what must be stabilized first.

## Assessment domains

| Domain                                 | Minimum operating question                                                       | Evidence to inspect                                        |
|----------------------------------------|----------------------------------------------------------------------------------|------------------------------------------------------------|
| <b>Governance</b>                      | Sponsor, owner, charter, decision rights and escalation exist.                   | Executive approvals; governance minutes; ownership records |
| <b>Business and regulatory context</b> | Customer commitments and obligations are inventoried and maintained.             | Contracts; obligation register; legal interpretations      |
| <b>Risk management</b>                 | Criteria, owners, treatment and acceptance are consistent.                       | Risk methodology; register; treatment records              |
| <b>Control framework</b>               | Controls have objectives, scope, owners, frequency and failure criteria.         | Control library; RACI; procedures                          |
| <b>Engineering integration</b>         | Requirements enter normal design, backlog and change processes.                  | Tickets; design reviews; architecture records              |
| <b>Evidence and testing</b>            | Evidence is complete, accurate, timely and independently reviewable.             | Evidence repository; test records; sample results          |
| <b>Audit and assurance</b>             | Audits and customer claims are supported by approved, current content.           | Audit calendar; assurance library; approvals               |
| <b>Issues and exceptions</b>           | Findings and exceptions have owners, deadlines, approval and closure validation. | Exception register; corrective actions; closure evidence   |
| <b>TPRM</b>                            | Vendor review depth reflects access, data, dependency and risk.                  | Vendor inventory; tiers; assessments; remediation          |
| <b>Resilience</b>                      | Critical processes and recovery expectations are understood and tested.          | BIA; plans; exercises; lessons learned                     |
| <b>Metrics</b>                         | Leadership can see material exposure, aging, ownership and trends.               | Dashboards; committee materials; KRIs                      |
| <b>Automation readiness</b>            | Stable controls, authoritative data and failure workflows exist.                 | Data-source map; automation backlog; pilot results         |

## Simple scoring model

| Score               | Meaning                                                           | Use in planning                                   |
|---------------------|-------------------------------------------------------------------|---------------------------------------------------|
| <b>0 — Absent</b>   | No repeatable practice or accountable owner.                      | Treat as foundational work.                       |
| <b>1 — Informal</b> | Activity occurs through personal knowledge or one-off effort.     | Document the actual process and assign ownership. |
| <b>2 — Defined</b>  | Requirements and procedures exist, but operation is inconsistent. | Standardize and test.                             |

| Score                  | Meaning                                                              | Use in planning                            |
|------------------------|----------------------------------------------------------------------|--------------------------------------------|
| <b>3 — Operational</b> | The practice runs on a cadence with evidence and issue handling.     | Improve quality, integration and coverage. |
| <b>4 — Integrated</b>  | The practice is embedded across relevant workflows and systems.      | Automate selectively and measure trends.   |
| <b>5 — Adaptive</b>    | The practice changes based on risk, performance and business change. | Continuously optimize.                     |

### Do not average away critical gaps

A high overall score can hide a severe weakness in privileged access, change control, customer claims, vendor dependency or incident response. Material risks should override average maturity scores.

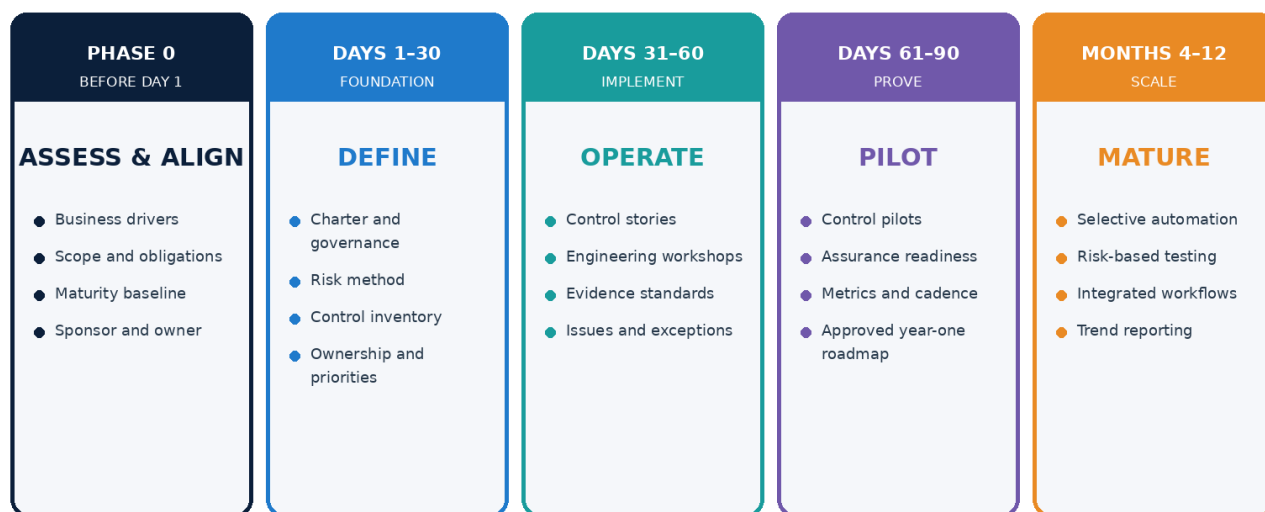
## Readiness outcome categories

| Outcome                               | Meaning                                                                                  | Next action                              |
|---------------------------------------|------------------------------------------------------------------------------------------|------------------------------------------|
| <b>Ready to proceed</b>               | Sponsor, owner, scope and execution capacity are sufficient.                             | Launch the 90-day roadmap.               |
| <b>Foundation required</b>            | Critical prerequisites are missing, but can be resolved internally.                      | Run a focused 30-day stabilization plan. |
| <b>Leadership decision required</b>   | Ownership, funding, scope or risk acceptance is unresolved.                              | Escalate options and consequences.       |
| <b>Specialist support recommended</b> | The organization lacks capacity or needs independent design, validation or facilitation. | Define a targeted advisory engagement.   |

## 06 BUILD THE ROADMAP AND GOVERNANCE STRUCTURE

*The roadmap should connect business drivers to risk, controls, engineering work, evidence and leadership decisions.*

### 90-DAY SAAS GRC STARTER ROADMAP



Sequence matters: establish governance and implement controls before expanding automation.

### Roadmap workstreams

| Workstream                     | Initial objective                                                        | First evidence of progress                               |
|--------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------|
| <b>Governance</b>              | Confirm sponsor, owner, roles, decisions and escalation.                 | Charter, RACI and meeting cadence approved.              |
| <b>Risk</b>                    | Create consistent criteria and connect treatment to priorities.          | Top risks have owners and treatment decisions.           |
| <b>Controls</b>                | Define a small, material portfolio ready for engineering implementation. | Control records and acceptance criteria approved.        |
| <b>Engineering integration</b> | Put control work into existing design and delivery processes.            | Backlog items, design reviews and implementation owners. |
| <b>Evidence and assurance</b>  | Establish evidence quality and approved customer content.                | Evidence map and assurance review process.               |
| <b>Issues and exceptions</b>   | Make failures, findings and deviations visible and time-bound.           | Registers, SLAs and escalation rules operating.          |
| <b>Automation</b>              | Prioritize stable controls with authoritative data sources.              | Pilot backlog with success measures.                     |

| Workstream     | Initial objective                                         | First evidence of progress    |
|----------------|-----------------------------------------------------------|-------------------------------|
| <b>Metrics</b> | Show exposure, aging, ownership and delivery constraints. | Monthly leadership dashboard. |

## Governance cadences

| Cadence                            | Purpose                                                  | Participants                                        | Typical decisions                                             |
|------------------------------------|----------------------------------------------------------|-----------------------------------------------------|---------------------------------------------------------------|
| <b>Weekly working review</b>       | Resolve blockers and urgent control failures.            | GRC owner, control owners, Engineering/IT delegates | Owner assignment, due dates, escalation and evidence gaps.    |
| <b>Monthly operating review</b>    | Evaluate risk, control performance and roadmap delivery. | Security, Engineering, IT, Legal, Procurement, GRC  | Priorities, exceptions, remediation and resources.            |
| <b>Quarterly leadership review</b> | Make material risk and investment decisions.             | Executive sponsor and accountable leaders           | Risk acceptance, roadmap changes, funding and accountability. |

### Roadmap rule

Every roadmap item should identify the risk or business driver, accountable owner, intended operating outcome, dependencies, evidence of completion and decision required if delivery slips.

## Selecting the first control pilots

| Selection factor                 | Good pilot characteristic                                                              |
|----------------------------------|----------------------------------------------------------------------------------------|
| <b>Materiality</b>               | The control addresses a meaningful customer, security, regulatory or operational risk. |
| <b>Manageable scope</b>          | The population can be identified and implemented without a company-wide redesign.      |
| <b>Engineering participation</b> | A technical owner is available and willing to work through the complete lifecycle.     |
| <b>Evidence potential</b>        | Authoritative evidence can be produced or improved during the pilot.                   |
| <b>Visible outcome</b>           | Leadership can understand the result, limitation and next decision within 90 days.     |

A strong pilot proves the operating method, not just the configuration. Select two to four controls that expose ownership, design, evidence, exception and remediation workflows without creating an unmanageable transformation.

## 07 WORK WITH ENGINEERS WITHOUT BECOMING A BOTTLENECK

*GRC should make the required outcome and decision rules clear while allowing engineers to select appropriate technical designs.*

Engineering-led SaaS environments already contain controls. They exist in architecture, identity systems, cloud configuration, code review, deployment pipelines, monitoring, incident response and operational routines. The first GRC task is to understand those mechanisms before introducing new documentation or tooling.

### The engineering partnership model

| GRC owns                                                                                                                          | Engineering owns                                                                                                   | Shared responsibility                                                                                              |
|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|
| Risk context; control objective; obligation traceability; evidence expectation; testing criteria; exception and escalation rules. | Technical design; implementation method; platform configuration; operational support; feasibility and reliability. | Scope; acceptance criteria; implementation sequencing; evidence design; testing; failure response and improvement. |

### Behaviors that build credibility

- Learn the architecture, delivery process and existing technical safeguards before proposing new work.
- Bring a defined problem and required outcome—not a framework citation disguised as a technical requirement.
- Explain customer, regulatory, security and operational consequences in practical terms.
- Accept technically equivalent solutions when they achieve the control outcome and evidence standard.
- Use normal engineering workflows: design reviews, tickets, backlog prioritization, testing and change management.
- Distinguish mandatory constraints from preferred implementation choices.
- Reduce repeated evidence requests by designing evidence into the technical workflow.
- Escalate unresolved risk decisions through governance rather than arguing indefinitely with engineers.

### The control conversation

| Question                                                         | Why it matters                                                                     |
|------------------------------------------------------------------|------------------------------------------------------------------------------------|
| <b>What can go wrong, and what business impact matters?</b>      | Creates shared understanding of the risk rather than abstract compliance pressure. |
| <b>What outcome must remain true?</b>                            | Defines the control without prescribing unnecessary architecture.                  |
| <b>Which systems, identities, data and teams are in scope?</b>   | Prevents incomplete implementation and misleading evidence.                        |
| <b>What technical approaches are feasible?</b>                   | Respects engineering design authority and reveals dependencies.                    |
| <b>What evidence can the system produce by design?</b>           | Reduces manual collection and improves reliability.                                |
| <b>How will failure be detected and routed?</b>                  | Turns the control into an operating process.                                       |
| <b>What exceptions are legitimate, and who can approve them?</b> | Prevents silent deviations and permanent bypasses.                                 |

### Message to Engineering

“GRC is not here to add paperwork. We are here to clarify the risk and required outcome, reduce repeated evidence requests, make decisions traceable and help the organization scale without relying on informal knowledge.”

## Engineering engagement sequence

| Step                | GRC action                                                                       | Engineering outcome                                                   |
|---------------------|----------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| <b>1. Discover</b>  | Understand architecture, workflow, existing safeguards and known constraints.    | Current-state design and ownership are accurately represented.        |
| <b>2. Frame</b>     | Explain the risk, business driver, required outcome and decision needed.         | The team understands why the work matters.                            |
| <b>3. Co-design</b> | Agree scope, design options, acceptance criteria, evidence and failure handling. | A feasible design and implementation path emerge.                     |
| <b>4. Deliver</b>   | Place work into normal planning, ticketing, testing and change processes.        | The control is implemented through established engineering practices. |
| <b>5. Validate</b>  | Test scope, configuration, operation, evidence and exception handling.           | The team has a defensible conclusion—not merely a closed ticket.      |
| <b>6. Operate</b>   | Monitor failure, ownership, change and improvement needs.                        | The control becomes a sustained capability.                           |

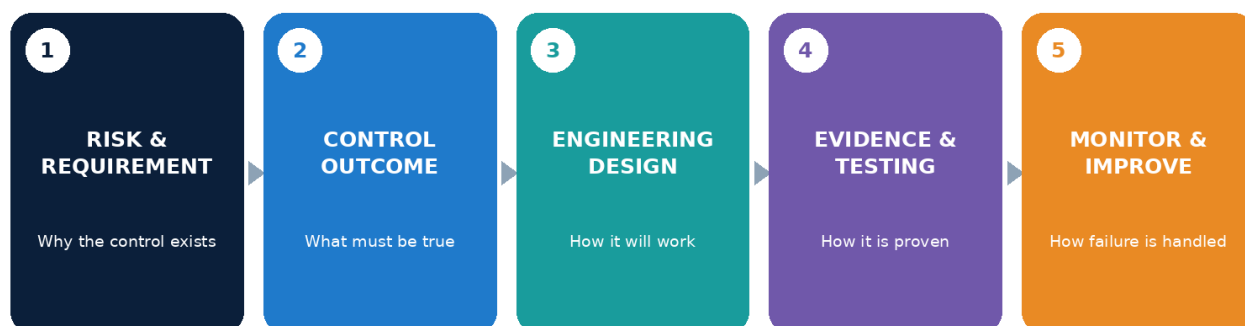
## Escalate through governance when

- A material control outcome cannot be achieved within the required timeframe.
- Scope or architecture decisions leave significant systems or data outside the control.
- Engineering and GRC disagree on residual risk rather than implementation preference.
- The proposed exception lacks adequate safeguards, ownership or expiration.
- Roadmap delivery requires priority, funding or risk acceptance beyond the team’s authority.

## 08 IMPLEMENT CONTROLS THROUGH A REPEATABLE LIFECYCLE

*Each material control should move from a business risk to an engineered, testable and monitored operating capability.*

### CONTROL IMPLEMENTATION WITH ENGINEERING



GRC defines risk, outcomes, evidence and decision rules. Engineering retains appropriate design authority.

#### Stage 1 — Risk and requirement

Identify the business process, system, data, threat, customer commitment or obligation that creates the need. Separate mandatory requirements from internal design preferences. Record assumptions and unresolved interpretations.

#### Stage 2 — Control outcome

Define what must be true, who is accountable, what is in scope, how often the control operates and what constitutes failure. The outcome should be specific enough to test while preserving reasonable design flexibility.

#### Stage 3 — Engineering design and implementation

Translate the control into normal engineering work. Capture the problem, outcome, scope, acceptance criteria, dependencies, observability, evidence, rollout, rollback and exception pathway. Engineers should determine the design unless a mandatory constraint applies.

#### Stage 4 — Evidence and testing

Validate both design and operation. Evidence must represent the complete population, authoritative source, applicable period and actual control behavior. A configuration existing in one account or repository does not prove complete implementation.

## Stage 5 — Monitor and improve

Monitor failures, false positives, exceptions, ownership changes, architecture changes and evidence quality. Reassess the control after incidents, findings, product launches, major platform changes or new obligations.

### Starter control record

| Field                           | Minimum content                                                                |
|---------------------------------|--------------------------------------------------------------------------------|
| <b>Risk and business driver</b> | The scenario, impact and reason the control matters now.                       |
| <b>Control objective</b>        | A testable statement of the required outcome.                                  |
| <b>Scope</b>                    | Products, systems, accounts, repositories, data, environments and populations. |
| <b>Ownership</b>                | Accountable owner, technical operator, reviewer and escalation owner.          |
| <b>Frequency or trigger</b>     | Continuous, per change, daily, monthly, quarterly or event-driven.             |
| <b>Acceptance criteria</b>      | Observable conditions that must be met for implementation approval.            |
| <b>Evidence</b>                 | Authoritative source, required fields, period, population and retention.       |
| <b>Failure response</b>         | Detection, routing, remediation deadline and escalation.                       |
| <b>Exception path</b>           | Justification, compensating safeguards, approval, review and expiration.       |

### Example: secure production change control

| Element                           | Example                                                                                                                                               |
|-----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Risk</b>                       | Unauthorized, unreviewed or untested changes could reach production and affect security, availability or customer commitments.                        |
| <b>Control outcome</b>            | Production changes are attributable, reviewed, tested, approved and deployed through controlled mechanisms.                                           |
| <b>Engineering implementation</b> | Protected branches or rulesets, required reviews, automated checks, restricted deployment permissions, traceable CI/CD and emergency-change handling. |
| <b>Evidence</b>                   | Repository/ruleset configuration, pull-request approvals, test results, deployment records, bypass events and exception records.                      |
| <b>Failure response</b>           | Investigate unauthorized or bypassed changes, contain impact, document root cause, remediate configuration and escalate based on severity.            |

### Example: privileged cloud access

| Element     | Example                                                                                                     |
|-------------|-------------------------------------------------------------------------------------------------------------|
| <b>Risk</b> | Compromised or excessive privileged access could expose customer data, infrastructure or security services. |

| Element                           | Example                                                                                                                                                             |
|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Control outcome</b>            | Privileged production access is limited, strongly authenticated, attributable, approved and periodically reviewed.                                                  |
| <b>Engineering implementation</b> | Federated identities, role-based access, MFA, short-lived sessions, restricted break-glass access, logging and automated checks for direct or persistent privilege. |
| <b>Evidence</b>                   | Identity configuration, privileged-role inventory, access approvals, review records, authentication policy and access logs.                                         |
| <b>Failure response</b>           | Disable unauthorized access, investigate use, review related activity, correct entitlement sources and document risk treatment.                                     |

### Definition of done

A control is not complete when a ticket closes. It is complete when scope is validated, acceptance criteria are met, evidence is reliable, ownership is active, failures route correctly and exceptions are governed.

## Implementation sign-off checklist

- The complete in-scope population has been validated.
- Acceptance criteria have been tested with representative and negative scenarios.
- Evidence identifies the source, period, population and accountable reviewer.
- Monitoring or periodic testing detects material failure.
- Failed results create an owner, deadline and escalation path.
- Approved exceptions are visible and do not mask unrelated failures.
- The control owner accepts ongoing operation and maintenance responsibility.

## 09 BUILD EVIDENCE AND ASSURANCE OPERATIONS

*Evidence should be designed as a product of the control—not assembled as an audit-season scavenger hunt.*

### Evidence quality standard

| Quality              | Question to answer                                                                          |
|----------------------|---------------------------------------------------------------------------------------------|
| <b>Relevance</b>     | Does the evidence prove the actual control objective?                                       |
| <b>Completeness</b>  | Does it cover the full in-scope population, period and environment?                         |
| <b>Accuracy</b>      | Is it produced by or reconciled to an authoritative source?                                 |
| <b>Timeliness</b>    | Does it represent the required operating period or trigger?                                 |
| <b>Attribution</b>   | Can the activity, approval or review be connected to accountable identities?                |
| <b>Integrity</b>     | Can the evidence be altered, filtered or selected without detection?                        |
| <b>Reviewability</b> | Can an independent reviewer understand what was tested and why the conclusion is supported? |

### Build an evidence map

| Control                  | Authoritative source            | Collection                                        | Review                                | Failure route                            |
|--------------------------|---------------------------------|---------------------------------------------------|---------------------------------------|------------------------------------------|
| <b>Privileged access</b> | Identity provider and cloud IAM | Automated inventory plus periodic review record   | Security/IT owner                     | Access-remediation ticket and escalation |
| <b>Change control</b>    | Source control and CI/CD        | Per change; configuration snapshot                | Engineering owner and GRC sample test | Investigation and corrective action      |
| <b>Logging</b>           | Cloud and security tooling      | Continuous configuration and ingestion monitoring | Security Engineering                  | Alert/ticket for coverage loss           |
| <b>Vendor review</b>     | Procurement/TPRM repository     | At intake and reassessment                        | Business owner and Security           | Finding, exception or risk acceptance    |

### Customer assurance content governance

- Maintain approved answers for recurring security, privacy, resilience, AI and vendor-management questions.
- Assign content owners and review dates.
- Connect material claims to evidence, certifications or documented operating practices.
- Require review for new or high-risk claims, unusual contract commitments and customer-specific exceptions.

- Retire stale language and prevent teams from reusing unsupported answers.

### Assurance risk

A fast questionnaire response is not valuable if it overstates the company's controls. Customer-facing claims must be current, approved and supportable.

## Assurance response workflow

| Step                          | Required practice                                                                           |
|-------------------------------|---------------------------------------------------------------------------------------------|
| <b>Intake and classify</b>    | Identify customer, deadline, deal significance, requested evidence and unusual commitments. |
| <b>Reuse approved content</b> | Start from current answers with assigned owners and review dates.                           |
| <b>Validate exceptions</b>    | Route new claims, high-risk answers and nonstandard commitments to qualified reviewers.     |
| <b>Approve and deliver</b>    | Record the final response, approval and supporting evidence.                                |
| <b>Learn and maintain</b>     | Add reusable content, retire stale language and track recurring customer concerns.          |

## Decisions to make about evidence retention

- Where the authoritative evidence remains and whether a copy is necessary.
- How long evidence is retained based on audit periods, contracts and legal requirements.
- Who may access sensitive technical, customer or personnel information.
- How evidence integrity, versioning and reviewer conclusions are preserved.

# 10 GOVERN RISK, EXCEPTIONS, REMEDIATION AND VENDORS

*Controls will fail, designs will change and third parties will create dependencies. Mature governance turns those realities into explicit decisions.*

## Risk management minimum standard

| Component             | Minimum expectation                                                          |
|-----------------------|------------------------------------------------------------------------------|
| <b>Risk statement</b> | Cause, event and business impact are clear.                                  |
| <b>Criteria</b>       | Likelihood and impact definitions are used consistently.                     |
| <b>Ownership</b>      | A business or technology leader owns the risk and treatment.                 |
| <b>Treatment</b>      | Mitigate, avoid, transfer or accept—with actions and dates.                  |
| <b>Residual risk</b>  | The remaining exposure after safeguards is understood.                       |
| <b>Acceptance</b>     | Only authorized leaders accept material risk.                                |
| <b>Monitoring</b>     | Changes, dependencies, incidents and overdue treatment trigger reassessment. |

## Security exception workflow

| Required field                 | Why it matters                                       |
|--------------------------------|------------------------------------------------------|
| <b>Business justification</b>  | Explains why the standard cannot currently be met.   |
| <b>Affected scope</b>          | Identifies systems, users, data and environments.    |
| <b>Risk analysis</b>           | Makes consequences and exposure explicit.            |
| <b>Compensating safeguards</b> | Documents what reduces risk during the exception.    |
| <b>Owner and approver</b>      | Creates accountability for operation and acceptance. |
| <b>Expiration and review</b>   | Prevents permanent undocumented deviation.           |
| <b>Closure evidence</b>        | Proves the exception ended or was formally renewed.  |

## Corrective action standard

- Describe the finding and affected control accurately.
- Identify root cause rather than treating the visible symptom only.
- Assign an accountable owner, remediation actions and due date.
- Use interim safeguards when the final fix cannot be immediate.
- Require evidence and independent validation before closure.
- Escalate overdue or repeatedly reopened issues based on risk.

## Risk-based TPRM

| Factor               | Higher-risk indicators                                                 |
|----------------------|------------------------------------------------------------------------|
| <b>Data</b>          | Sensitive, regulated or large-volume customer data.                    |
| <b>Access</b>        | Privileged, production, persistent or broad internal access.           |
| <b>Dependency</b>    | Service failure materially disrupts product or operations.             |
| <b>Integration</b>   | Embedded code, APIs, agents, identity or infrastructure.               |
| <b>AI use</b>        | Training, inference, model access or opaque downstream providers.      |
| <b>Concentration</b> | Limited alternatives, long migration period or systemic dependency.    |
| <b>Assurance</b>     | Weak evidence, unresolved findings or limited contractual commitments. |

### Engineering must participate

When a vendor is embedded in product or infrastructure, GRC cannot evaluate risk from a questionnaire alone. Engineering must explain architecture, data flow, permissions, failure modes, monitoring and realistic alternatives.

## Vendor review workflow

| Stage                           | Starter outcome                                                                                   |
|---------------------------------|---------------------------------------------------------------------------------------------------|
| <b>Tier and scope</b>           | Risk tier reflects data, access, integration, dependency, AI use and business criticality.        |
| <b>Due diligence</b>            | Evidence and questions are proportionate to the tier and intended use.                            |
| <b>Technical validation</b>     | Engineering confirms architecture, permissions, data flow, monitoring and failure assumptions.    |
| <b>Decision and contracting</b> | Findings drive remediation, safeguards, contract terms, exception or risk acceptance.             |
| <b>Ongoing oversight</b>        | Reassessment, material changes, incidents, assurance updates and exit dependencies are monitored. |

## Questions Engineering should answer

- What data, credentials, code, infrastructure or identities can the vendor access?
- What fails if the vendor is unavailable, compromised or materially changed?
- How is vendor activity logged, monitored, restricted and removed?
- What alternatives, migration effort and concentration risks exist?

# 11 AUTOMATE SELECTIVELY AND SAFELY

*Automation should scale stable controls and decision workflows—not conceal weak control design.*

## Automation readiness criteria

| Criterion                     | Ready when...                                                                |
|-------------------------------|------------------------------------------------------------------------------|
| <b>Stable control outcome</b> | Teams agree on what must be true and what constitutes failure.               |
| <b>Reliable scope</b>         | The in-scope accounts, repositories, assets or identities can be enumerated. |
| <b>Authoritative data</b>     | A trusted source provides complete and timely information.                   |
| <b>Actionable result</b>      | A failed check leads to a defined owner, ticket, remediation or escalation.  |
| <b>Exception awareness</b>    | Legitimate deviations can be identified without suppressing real failures.   |
| <b>Validation plan</b>        | The organization can test completeness, accuracy and false positives.        |
| <b>Sustainable ownership</b>  | Someone maintains logic when architecture or platforms change.               |

## Prioritization factors

| Factor                  | Prioritize when...                                                               |
|-------------------------|----------------------------------------------------------------------------------|
| <b>Risk</b>             | Failure could materially affect customers, security, availability or compliance. |
| <b>Frequency</b>        | The control operates often enough that manual work is costly or stale.           |
| <b>Population</b>       | The environment is too large for reliable manual review.                         |
| <b>Evidence burden</b>  | The same evidence is repeatedly requested by auditors or customers.              |
| <b>Data quality</b>     | The source can produce complete, trustworthy information.                        |
| <b>Failure response</b> | Owners can act on findings within a defined workflow.                            |

## Appropriate uses of AI in a starter program

- Drafting questionnaire responses from approved content for human review.
- Mapping evidence to controls and identifying missing fields.
- Summarizing findings, policy changes and vendor documentation.
- Classifying intake requests and routing them to the correct owner.

- Identifying duplicate controls or inconsistent terminology.
- Preparing management summaries from validated source data.

### Keep human accountability

Risk acceptance, external claims, regulatory interpretations, control-effectiveness conclusions, material exceptions and high-risk vendor decisions should remain subject to accountable human review.

## Automation pilot workflow

| Stage                | Required outcome                                                                      |
|----------------------|---------------------------------------------------------------------------------------|
| <b>Select</b>        | Choose a stable, material control with reliable scope and an accountable owner.       |
| <b>Map data</b>      | Confirm the authoritative source, fields, population, timing and known limitations.   |
| <b>Define logic</b>  | Document pass, fail, exception, unknown and data-quality conditions.                  |
| <b>Route results</b> | Send failures to owners with context, severity, deadline and escalation.              |
| <b>Validate</b>      | Compare automated output with manual samples and investigate false results.           |
| <b>Operate</b>       | Assign maintenance ownership and review logic after platform or architecture changes. |

## Pilot success criteria

- Coverage is complete enough to support the control conclusion.
- False positives and false negatives are understood and within an accepted tolerance.
- Failures lead to timely, traceable action rather than dashboard noise.
- Auditors and control owners can understand the logic and supporting data.
- The operating cost is lower or the risk visibility is materially better than the prior method.

# 12 MEASURE PROGRESS AND MATURE THE PROGRAM

*Metrics should reveal exposure, performance and decision delay—not create decorative dashboards.*

## Starter metrics

| Metric                                          | What it reveals                                | Avoid                                               |
|-------------------------------------------------|------------------------------------------------|-----------------------------------------------------|
| <b>Material risks without active treatment</b>  | Decision and ownership gaps.                   | Counting every low-value risk equally.              |
| <b>High-risk remediation aging</b>              | Exposure created by delayed corrective action. | Reporting closure counts without severity.          |
| <b>Control failure rate and recurrence</b>      | Control reliability and systemic weakness.     | Treating every automated check as a control.        |
| <b>Evidence freshness and completeness</b>      | Readiness and control-operating discipline.    | Measuring files uploaded rather than quality.       |
| <b>Exceptions by severity and expiration</b>    | Accumulated deviation and acceptance delay.    | Allowing renewal without reassessment.              |
| <b>Vendor reviews overdue by tier</b>           | Third-party exposure and process capacity.     | Using one SLA for all vendors.                      |
| <b>Questionnaire turnaround and escalation</b>  | Sales enablement and assurance efficiency.     | Optimizing speed at the expense of accuracy.        |
| <b>Automation coverage of suitable controls</b> | Scale after design maturity.                   | Chasing a high percentage without validating value. |

## First-year maturity outcomes

| Period               | Expected outcome                                                                                                    |
|----------------------|---------------------------------------------------------------------------------------------------------------------|
| <b>First 30 days</b> | Business drivers, scope, sponsor, owner, maturity baseline and priorities are agreed.                               |
| <b>Days 31-60</b>    | Risk, control, evidence, issue and exception standards are defined.                                                 |
| <b>Days 61-90</b>    | A small set of controls has been implemented and tested with Engineering; governance reporting is operating.        |
| <b>Months 4-6</b>    | Evidence, assurance, TPRM, policy and remediation workflows are more consistent; suitable automation pilots expand. |
| <b>Months 7-12</b>   | Risk-based testing, integrated workflows, trend metrics and continuous improvement are established.                 |

## Annual reassessment triggers

- New products, significant architecture changes or major acquisitions.

- Entry into new regulated or geographic markets.
- Material incidents, audit findings or customer escalations.
- Significant changes in data use, AI capabilities or critical vendors.
- Leadership, ownership or operating-model changes.
- Evidence that controls are not reducing risk as intended.

## Year-end leadership questions

| Question                                               | Evidence of maturity                                                                   |
|--------------------------------------------------------|----------------------------------------------------------------------------------------|
| <b>Are material risks driving roadmap priorities?</b>  | Investment and treatment decisions trace to risk, customers and business objectives.   |
| <b>Are controls operating beyond audit season?</b>     | Owners, evidence, testing and failure handling run on defined cadences.                |
| <b>Is Engineering aligned with control outcomes?</b>   | Control work enters normal design and delivery workflows with fewer repeated requests. |
| <b>Are exceptions and findings shrinking or aging?</b> | Leadership sees severity, recurrence, deadlines and unresolved acceptance.             |
| <b>Is automation improving decisions?</b>              | Coverage and response improve without hiding data quality or scope limitations.        |

# 13 KNOW WHEN SPECIALIST SUPPORT IS WARRANTED

*Internal teams can make meaningful progress, but some situations require dedicated capacity, independent challenge or specialized implementation experience.*

## Signals that external support may be justified

| Signal                                                | Why it matters                                                                   |
|-------------------------------------------------------|----------------------------------------------------------------------------------|
| <b>No accountable program owner</b>                   | Cross-functional work will stall without coordination and decision authority.    |
| <b>Multiple frameworks or customer commitments</b>    | Control design and evidence can fragment without a common operating model.       |
| <b>Engineering resistance or unclear requirements</b> | An experienced facilitator can translate risk without dictating architecture.    |
| <b>Repeated audit or control failures</b>             | Independent review can identify design, scope and root-cause weaknesses.         |
| <b>Rapid sales or regulatory pressure</b>             | The organization may need a defensible interim operating model quickly.          |
| <b>GRC platform or automation purchase planned</b>    | Requirements and workflows should be stabilized before tool configuration.       |
| <b>High-risk vendors, AI or sensitive data</b>        | Specialized review may be necessary to evaluate complex dependencies and claims. |

## Good starter engagement outcomes

- Independent maturity and readiness baseline.
- Executive decision package and prioritized gap register.
- Customized 90-day and first-year roadmap.
- Engineering-aligned control implementation method.
- Initial control, evidence, exception and remediation standards.
- Facilitated implementation pilots and leadership reporting.
- Knowledge transfer to the future internal GRC owner.

### The goal is not dependence

A sound advisory engagement should leave the organization with clearer ownership, repeatable methods, usable artifacts and the ability to operate the program—not permanent reliance on a consultant.

# APPENDIX A QUICK-START READINESS CHECKLIST

Use this checklist to determine whether the organization is prepared to launch the 90-day roadmap.



| Readiness item                                                       | Complete                 |
|----------------------------------------------------------------------|--------------------------|
| Executive sponsor identified                                         | <input type="checkbox"/> |
| Program owner identified                                             | <input type="checkbox"/> |
| Business driver and target outcome documented                        | <input type="checkbox"/> |
| Products, systems and data scope drafted                             | <input type="checkbox"/> |
| Customer, regulatory and framework obligations inventoried           | <input type="checkbox"/> |
| Engineering, IT, Security, Legal and Procurement contacts identified | <input type="checkbox"/> |
| Prior audits, policies, risk records and evidence available          | <input type="checkbox"/> |
| Top customer or audit deadlines known                                | <input type="checkbox"/> |
| Remediation capacity confirmed                                       | <input type="checkbox"/> |
| Leadership escalation path agreed                                    | <input type="checkbox"/> |
| Maturity assessment scheduled                                        | <input type="checkbox"/> |
| Phase 0 decision meeting scheduled                                   | <input type="checkbox"/> |

## Interpretation

Missing one item does not automatically stop the roadmap. Missing sponsorship, ownership, scope or remediation capacity usually does.

# APPENDIX B 90-DAY MASTER CHECKLIST

*A practical set of starter actions for an internal owner or interim program lead.*



## Phase 0 — assess and align

- Confirm business drivers and deadlines.
- Draft scope and obligation inventory.
- Identify sponsor, owner and stakeholders.
- Complete maturity assessment.
- Create priority gap register.
- Obtain proceed/stabilize/support decision.

## Days 1-30 — establish the foundation

- Approve charter and governance cadence.
- Define risk methodology and treatment rules.
- Inventory material controls and owners.
- Identify top engineering integration points.
- Establish issue, exception and evidence standards.
- Select initial control pilots.

## Days 31-60 — operationalize

- Run engineering control-design workshops.
- Create control stories and acceptance criteria.
- Put implementation work into normal backlogs.
- Define evidence maps and testing plans.
- Launch assurance-content governance.
- Begin risk and remediation reporting.

## Days 61-90 — prove and plan

- Validate pilot scope and implementation.
- Test evidence quality and failure routing.
- Resolve or escalate pilot gaps.
- Publish leadership metrics.
- Approve months 4-12 roadmap.
- Document lessons and refine the method.

# APPENDIX C STARTER CONTROL BRIEF

*Use one page per material control before detailed technical implementation.*



| Field                             | Starter entry |
|-----------------------------------|---------------|
| Business driver / risk            |               |
| Required control outcome          |               |
| In-scope systems and population   |               |
| Accountable owner                 |               |
| Engineering / technical owner     |               |
| Mandatory constraints             |               |
| Design options and dependencies   |               |
| Acceptance criteria               |               |
| Evidence and authoritative source |               |
| Testing method and frequency      |               |
| Failure response and escalation   |               |
| Exception process                 |               |
| Target date and roadmap priority  |               |

# APPENDIX D ENGINEERING CONTROL-DESIGN WORKSHOP

*A focused working session for one material control—not a general compliance presentation.*



| Time      | Agenda item                                            | Output                                    |
|-----------|--------------------------------------------------------|-------------------------------------------|
| 0-5 min   | Confirm risk, business driver and decision needed.     | Shared problem statement.                 |
| 5-15 min  | Review current architecture and operating practice.    | Current-state control map.                |
| 15-30 min | Agree control outcome, scope and constraints.          | Draft control record.                     |
| 30-45 min | Evaluate design options, evidence and failure routing. | Preferred design and acceptance criteria. |
| 45-55 min | Confirm dependencies, owner, backlog and target.       | Implementation plan.                      |
| 55-60 min | Record open risks and escalation needs.                | Decision and action log.                  |

## Pre-read

- Risk or obligation summary.
- Current process or architecture diagram.
- Draft control outcome and scope.
- Known customer, audit or regulatory commitments.
- Proposed evidence sources.
- Open questions that require Engineering input.

# A3INFOSEC SAAS GRC MATURITY AND ROADMAP ASSESSMENT

*A focused entry engagement for SaaS companies that need a credible starting point and an implementation path.*

A3INFOSEC helps SaaS organizations move from fragmented compliance activity to a risk-based GRC operating model that supports Engineering, customer trust and scalable growth.

## A typical assessment can include

| Work product                               | Business value                                                                        |
|--------------------------------------------|---------------------------------------------------------------------------------------|
| <b>Executive and stakeholder discovery</b> | Clarifies drivers, authority, constraints and success criteria.                       |
| <b>Maturity and readiness assessment</b>   | Creates an evidence-based baseline across governance, risk, controls and assurance.   |
| <b>Engineering and control review</b>      | Identifies where requirements, ownership and technical implementation are misaligned. |
| <b>Priority risk and gap register</b>      | Separates material exposure from low-value compliance activity.                       |
| <b>Customized 90-day roadmap</b>           | Provides sequenced actions, owners, dependencies and decision points.                 |
| <b>First-year maturity roadmap</b>         | Defines the path from stabilization through integration and selective automation.     |
| <b>Leadership readout</b>                  | Supports decisions on ownership, resources, risk acceptance and consulting support.   |

## Engagement principles

- Risk-based and business-aligned.
- Respectful of Engineering design authority.
- Evidence-driven and implementation-focused.
- Designed for knowledge transfer and internal ownership.
- Scaled to the organization's actual maturity and priorities.

### Next step

Use this runbook to complete the Phase 0 readiness review. When the organization needs independent validation, facilitation or implementation support, the maturity baseline becomes the starting point for a focused advisory engagement.

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# NOTES PROFESSIONAL USE AND REFERENCE FOUNDATION

*Adapt the model to the organization's architecture, risk profile, legal obligations, customer commitments and available resources.*



This publication is educational and does not constitute legal advice, an audit opinion, certification assurance or a complete security program. Requirements should be validated with qualified legal, audit, privacy, security and technical stakeholders.

## Reference foundation

- NIST Cybersecurity Framework 2.0 for governance and cybersecurity outcome structure.
- NIST SP 800-30 for risk assessment concepts.
- NIST SP 800-53 for security and privacy control concepts.
- NIST SP 800-37 for risk-management lifecycle concepts.
- NIST SP 800-161 for cybersecurity supply-chain risk-management concepts.
- NIST SP 800-34 for contingency-planning concepts.
- ISO/IEC 27001 for information security management system requirements.
- AICPA Trust Services Criteria for security, availability, processing integrity, confidentiality and privacy assurance concepts.

Frameworks should support the operating model, not replace it. Applicable requirements, versions and contractual commitments must be confirmed for each organization.



# A3INFOSEC

GRC Advisory for Confident, Scalable Growth

## READY TO TURN THE STARTER ROADMAP INTO AN OPERATING PROGRAM?

A3INFOSEC helps SaaS companies establish a maturity baseline, align GRC with Engineering, implement defensible controls, and build a practical roadmap for secure growth.

**SAAS GRC MATURITY & ROADMAP ASSESSMENT**

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