# WELCOME TO

# Replacing the FFIEC CAT: A Guide to Cybersecurity Frameworks

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Audit Management

Business Continuity Plan

Compliance Management

Cybersecurity Assessment

Identity Theft Prevention

Incident Management

Internet Banking Security

Phishing

Phishing

Risk Assessment

Risk Assessment

Vendor Management

# POLL QUESTION

What type of organization do you currently work for?



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# POLL QUESTION

What is your organization's asset size?

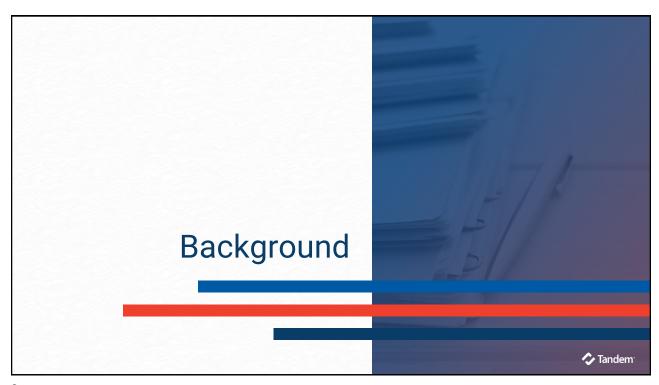


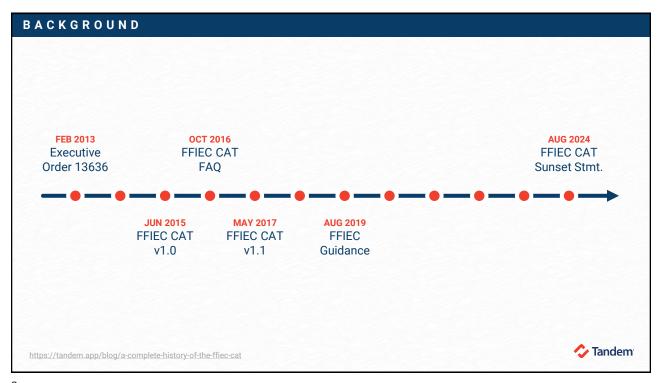
# **Session Topics**

- Background
- Frameworks Overview
- Comparing Frameworks
- How to Pick a Framework
- Tandem Cybersecurity Assessment
- Wrap Up & Resources



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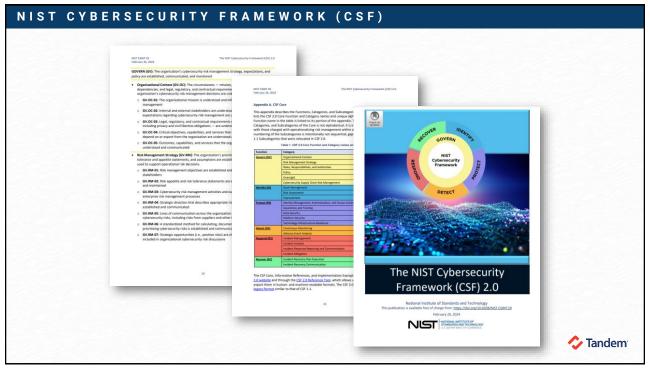


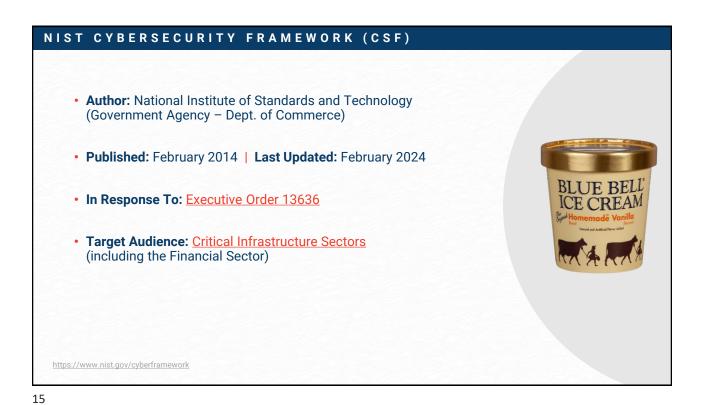


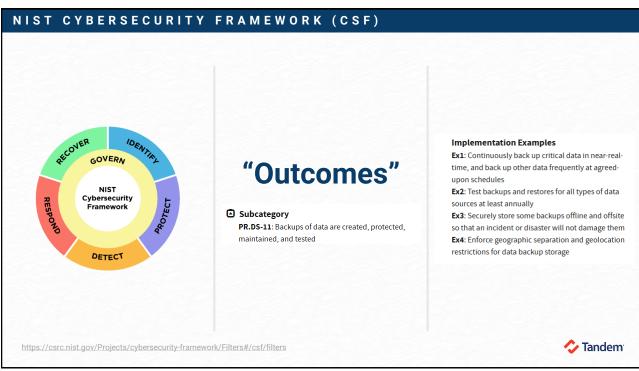


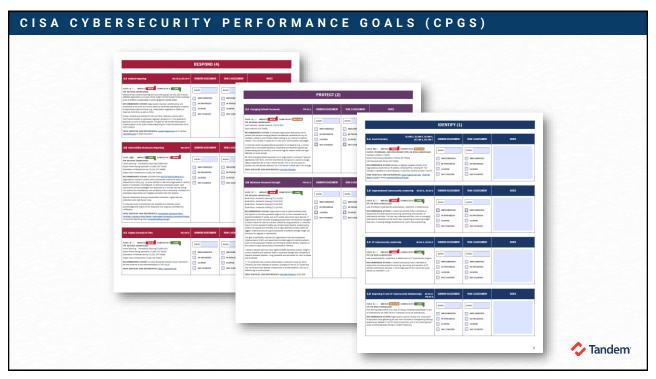
# What frameworks are you considering as a replacement for the FFIEC CAT?

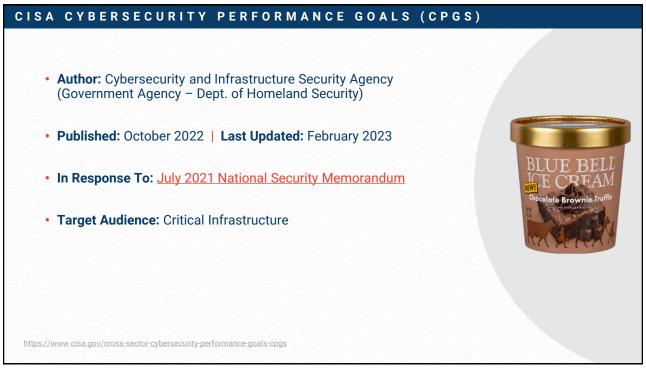


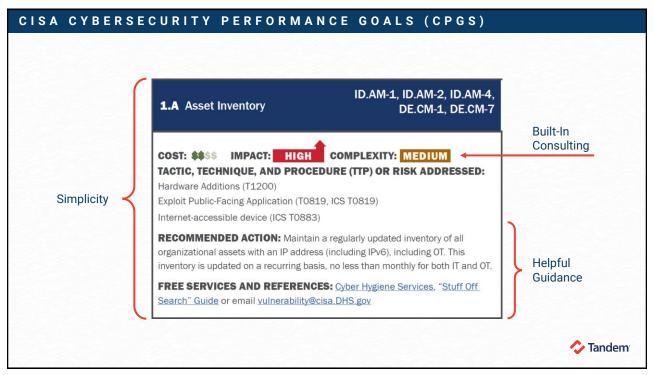




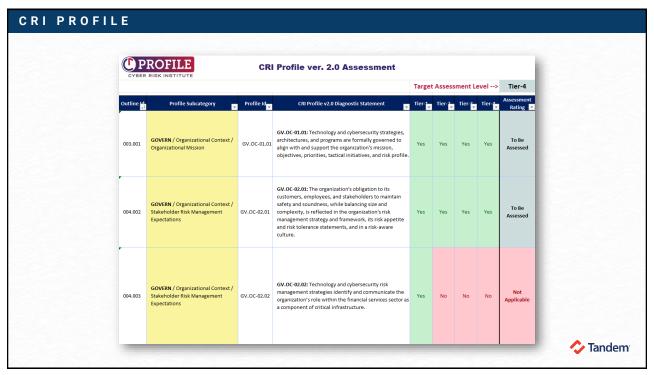




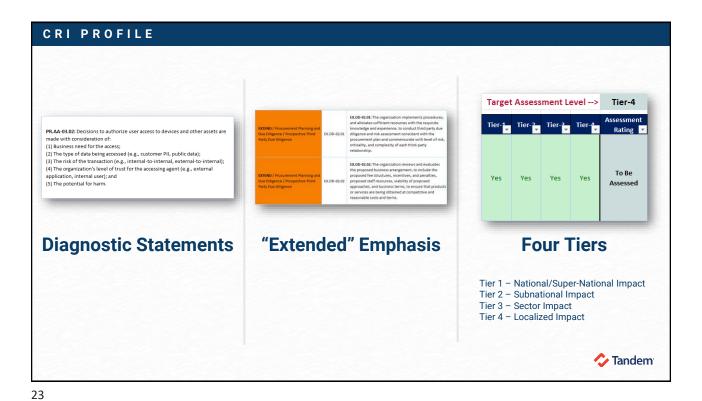












CRI PROFILE

# GV.RM-05.02

The organization establishes minimum requirements for its third-parties that include how the organizations will communicate and coordinate in times of emergency, including:

- 1. Joint maintenance of contingency plans;
- 2. Responsibilities for responding to incidents, including forensic investigations;
- 3. Planning and testing strategies that address severe events in order to identify single points of failure that would cause wide-scale disruption; and
- 4. Incorporating the potential impact of an incident into their BCM process and ensure resilience capabilities are in place.

# ID.RA-03.02

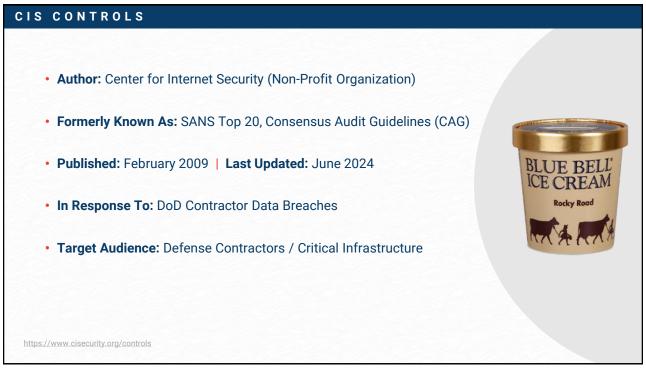
The organization solicits and considers threat intelligence received from the organization's stakeholders, service and utility providers, and other industry and security organizations.

# PR.PS-01.02

The organization's systems are configured to provide only essential capabilities to implement the principle of least functionality.

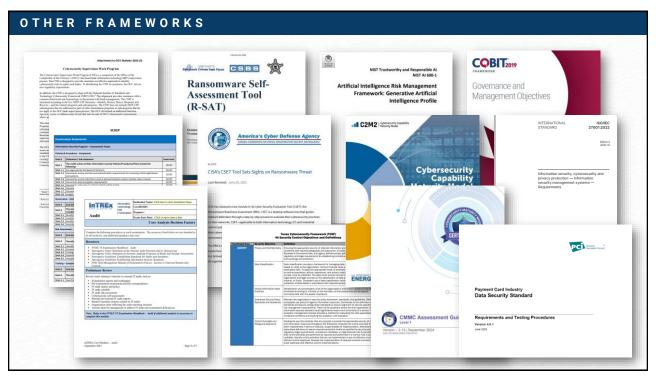


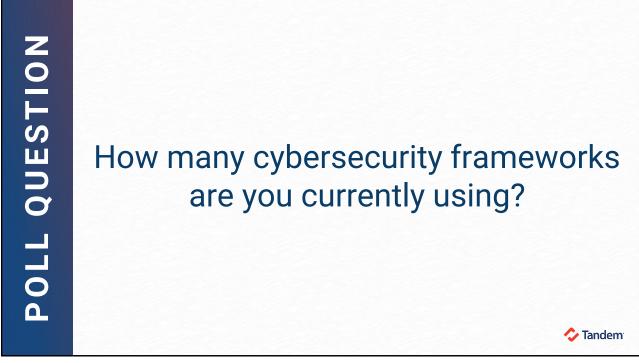






O: Do I have to use one of these four frameworks? Not necessarily. The FFIEC encourages a standardized approach to assessing cybersecurity preparedness. While the sunset statement listed four possible options for this, "supervised financial institutions may also consider use of industry developed resources," as long as the frameworks "support an effective control environment and are commensurate with [the institution's] risk." https://www.ffiec.gov/news/press-releases/2024/an-09-29 Tandem<sup>1</sup> https://www.ffiec.gov/news/press-releases/2019/pr-08-28

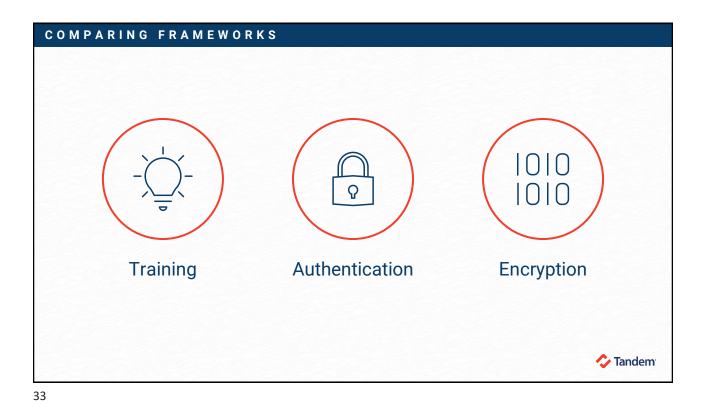


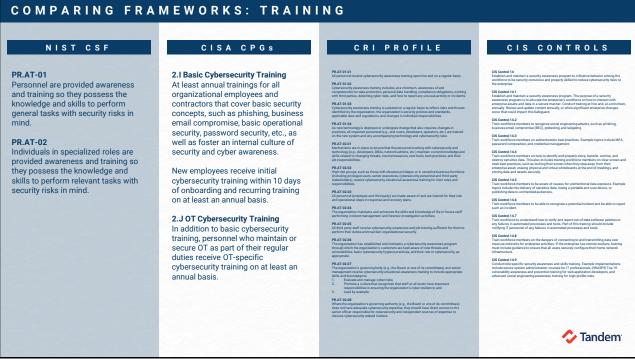






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# COMPARING FRAMEWORKS: AUTHENTICATION

# NIST CSF

# PR.AA-03

Users, services, and hardware are authenticated

# CISA CPGs

# 2.B Minimum Password Strength

Organizations have a systemenforced policy that requires a minimum password length of 15 or more characters for all

password-protected IT assets, and all OT assets where technically feasible. Organizations should consider leveraging passphrases and password managers to make it easier for users to maintain sufficiently long passwords. In instances where minimum password lengths are not technically feasible, compensating controls are applied and recorded, and all login attempts to those assets are logged. Assets that cannot support passwords of sufficient strength length are prioritized for upgrade or replacement.

# 2.H Phishing-Resistant MFA

Organizations implement MFA for access to assets using the strongest available method for that asset.

# CRI PROFILE

# PR.AA-01.01

PR.A.4-01.01 Identities and credentials are actively managed or automated for authorized devices and users (e.g., removal of default and factory passwords, password strength requirements, automatic revocation of credentials under defined conditions, regular asset owner access review, etc.).

PR.A.-U2.01 The organization authenticates identity, validates the authorization level of a user before granting access to its systems, limits the use of an account to a single individual, and attributes activities to the user in logs and transaction:

PR.AA-03.01
Based on the risk level of a user access or a specific transaction, the organization defines and implements authentication requirements, which may include multi-factor or out-of-band authentication, and may adopt other real-time risk prevention or mitigation tactics.

PR.AA-04.01

Access credential and authorization mechanisms for internal systems and across security perimeters (e.g., leveraging directory services, directory synchronization, single sign-on, federated access, credential mapping, etc.) are designed to maintain security, integrity, and authenticity.

PR.AA-05.02
The organization institutes controls over privileged system access by strictly limiting and closely managing staff and services with elevated system entitlements (e.g., multifactor authentication, dual accounts, privilege and time constraints, etc.)

PR.AA-05.03
The organization institutes controls over service account (r.e., accounts used by systems to access other systems) (r.e., accounts used by systems to access other systems) (r.e., accounts account to termination, access credentials (e.g., no embedded passwords in code), frequent reviews of account ownership, visibility for unauthorized use, and hardening against malicious insider use.

# CIS CONTROLS

CIS Control 4.10

Enforce automatic device lockout following a predetermined therebadd of local failed authentication attempts on portable end-user threshold of local failed authentication attempts, for tablets and smartphones, no more hard to failed authentication attempts, for tablets and smartphones, no more hard to failed authentication stempts, Example implementations include Microsoft® in Tune Device Lock and Apple® Configuration Profile maxil allectRempts.

CIS Control 5.2
Use unique passwords for all enterprise assets. Best practice implementation includes, at a minimum, an 8-character password for accounts using Multi-Factor Authentication (MFA) and a 14-character password for accounts not using MFA.

Perform automated vulnerability scans of internal enterprise assets on a quarterly, or more frequent, basis. Conduct both authenticated and unauthenticated scans.

CIS Control 12.7
Require users to authenticate to enterprise-managed VPN and authentication services prior to accessing enterprise resources on end-user devices.

Deploy port-level access control. Port-level access control utilizes 802.1x, or similar network access control protocols, such as certificates, and may incorporate user and/or device authentication.

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# COMPARING FRAMEWORKS: ENCRYPTION

# NIST CSF

# PR.DS-01

The confidentiality, integrity, and availability of data-at-rest are protected

# PR.DS-02

The confidentiality, integrity, and availability of data-in-transit are protected

# PR.DS-04

The confidentiality, integrity, and availability of data-in-use are protected

# CISA CPGs

# 2.K Strong and Agile Encryption

Properly configured and up-to-date transport layer security (TLS) is utilized to protect data in transit, when technically feasible. Organizations should also plan to identify any use of outdated or weak encryption, update these to sufficiently strong algorithms, and consider managing implications of post-quantum cryptography.

# CRI PROFILE

PR.DS-02.01
Data-in-transit is protected commensurate with the criticality sensitivity of the information and in alignment with the data classification and protection policy (e.g., through the use of encryption, authentication, access control, masking, tokeniza alternate transit paths).

Data-in-use is protected commensurate with the criticality an sensitivity of the information and in alignment with the data classification and protection policy (e.g., through the use of encryption, authentication, access control, masking, tokeniza

PR.PS-01.06

The organization employs defined encryption methods and management practices commensurate with the criticality of the information being protected and the inherent risk of the technica wavenument, where used.

PR.PS-01.08
End-user mibile or personal computing devices accessing the organization's network employ mechanisms to protect network, application, and data integrity, such as "Mobile Device Management (MAM") (MIM") and Mobile Application Management (MAM") (etcinologies, integrity scanning, automated patch application, ternot ewipe, and data leakage orpocations.

# CIS CONTROLS

Encrypt data on end-user devices containing sensitive data. Example implementations can include: Windows BitLocker®, Apple FileVault®, Linux® dm-crypt.

# CIS Control 3.9

Encrypt data on removable media.

# CIS Control 3.10 Encrypt sensitive data in transit. Example implementations can include: Transport Layer Security (TLS) and Open Secure Shell (OpenSSH).

CIS Control 3.11
Encrypt sensitive data at rest on servers, applications, and databass Strage-layer encryption, also known as server-side encryption, meets the minimum requirement of this Safeguard. Additional encryption methods may nicule application-layer encryption, also known as client-side encryption, where access to the data storage device(s) does not permit access to the plant-text data.

CIS Control 11.3
Protect recovery data with equivalent controls to the original data
Reference encryption or data separation, based on requirements.

# CIS Control 15.4

CIS Control 15.4 Ensure service provider contracts include security requirements. Example requirements may include minimum security program requirements, security incident and/or data breach notification and response, data encryption requirements, and data disposal commitments. These security requirements must be consistent with the enterprise's service provider management policy. Review service provider contracts annually to ensure contracts are not missing security requirements.

# CIS Control 16.11

CIS Control 16.11
Leverage vetted modules or services for application security components, such as identify immangement, encryption, and auditing components, such as identify immangement, encryption, and auditing and logging, bubles application tentures and include security functions will implementation errors. Modern operating systems groude effective mechanisms for definition, on sutherioration and make those mechanisms available to applications. Use only standardized, currently accepted, and extensively reviewed encryption algorithms. Operating systems also provide mechanisms to create and maintain secen audit logs.



# Overlap is not equal.



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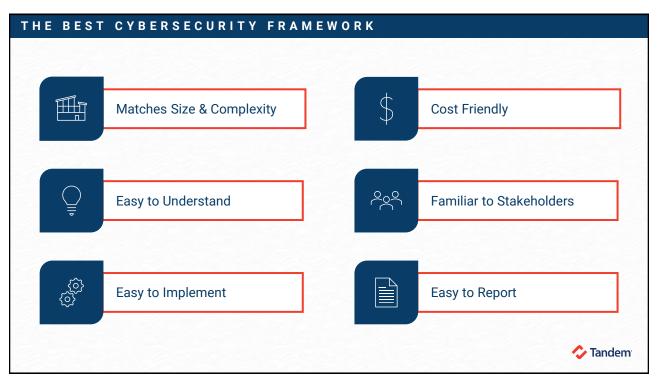
# POLL QUESTION

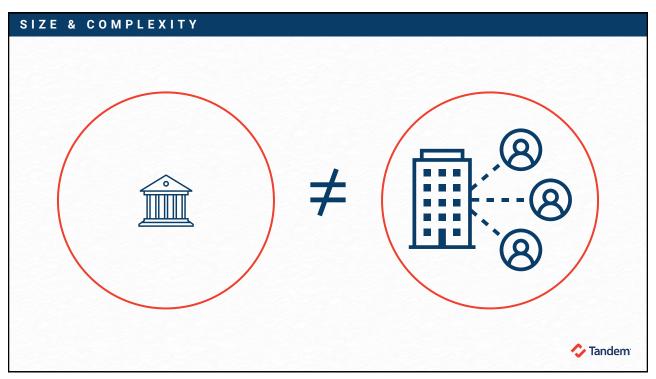
When do you plan to transition to another framework?



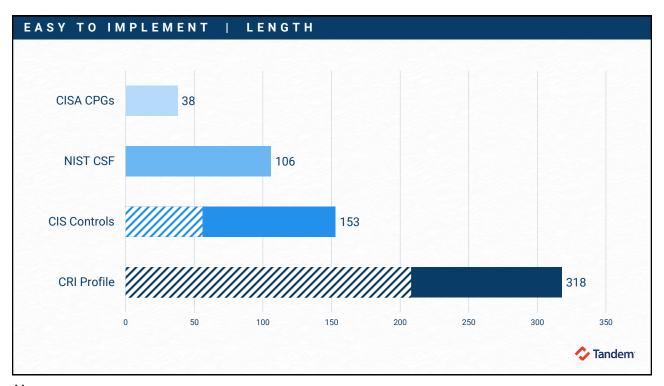


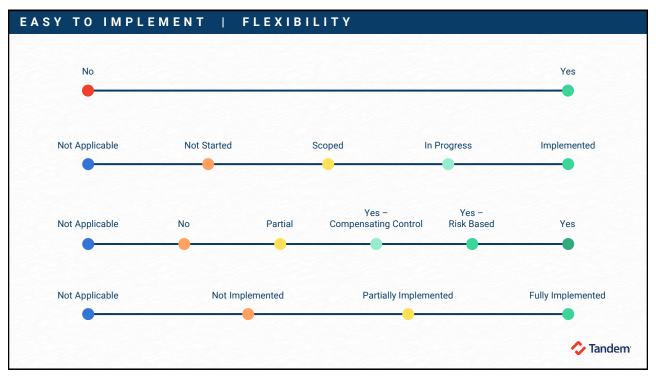














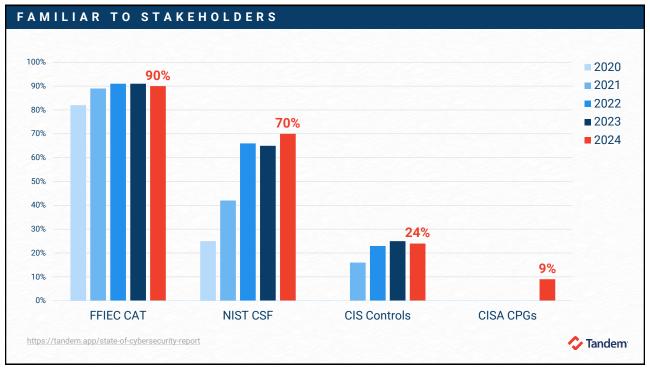
# POLL QUESTION

Will a vendor be helping you with your cybersecurity assessments?

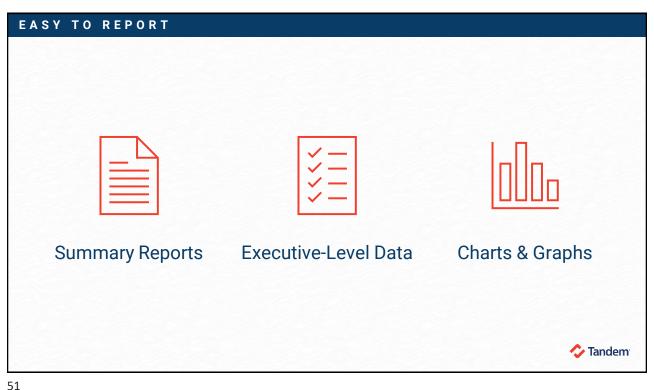


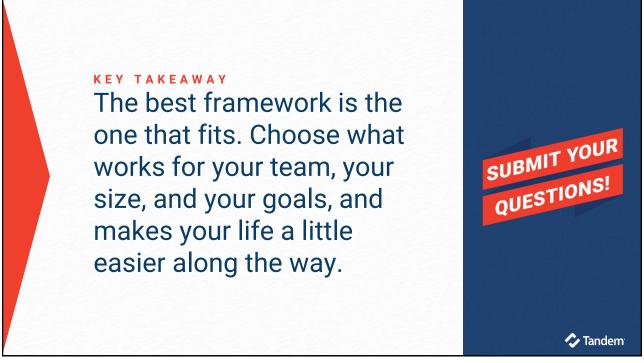
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Information Technology (IT)	External Auditors
Board of Directors	Regulators
Senior Leadership	Vendors (e.g., MSP, consultants, etc.)
	<b>◇</b> Tandem







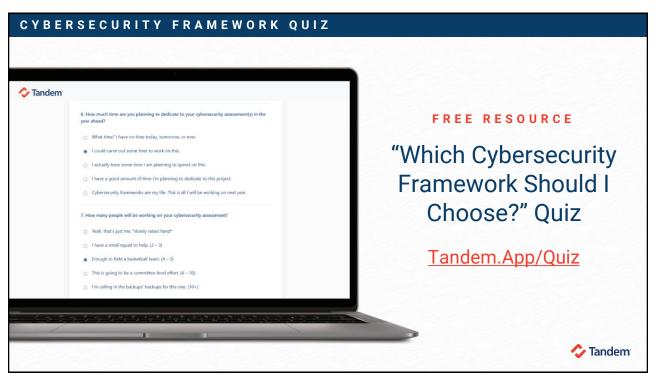


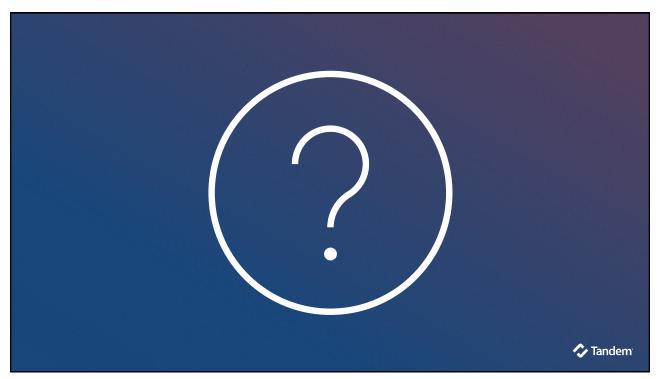












# THANKS FOR JOINING

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