

---

# PRIVILEGED ACCOUNT MANAGEMENT

Securing Privileged Accounts for the Financial  
Services Sector

---

James Banoczi

National Cybersecurity Center of Excellence

National Institute of Standards and Technology

Harry Perper and Susan Prince

The MITRE Corporation

DRAFT

October 2017

[financial\\_nccoe@nist.gov](mailto:financial_nccoe@nist.gov)



The National Cybersecurity Center of Excellence (NCCoE), a part of the National Institute of Standards and Technology (NIST), is a collaborative hub where industry organizations, government agencies, and academic institutions work together to address businesses' most pressing cybersecurity challenges. Through this collaboration, the NCCoE develops modular, easily adaptable example cybersecurity solutions demonstrating how to apply standards and best practices using commercially available technology. To learn more about the NCCoE, visit <http://nccoe.nist.gov>. To learn more about NIST, visit <http://www.nist.gov>.

This document describes a particular problem that is relevant across the financial services sector. NCCoE cybersecurity experts will address this challenge through collaboration with members of the financial services sector and vendors of cybersecurity solutions. The resulting reference design will detail an approach that can be used by financial services sector organizations.

### ABSTRACT

Privileged Account Management (PAM) is a domain within Identity and Access Management (IdAM) that focuses on monitoring and controlling the use of privileged accounts. Privileged accounts include local and domain administrative accounts, emergency accounts, application management, and service accounts. These powerful accounts provide elevated, often non-restricted access to the underlying IT resources and technology, which is why attackers or malicious insiders seek to gain access to them. Hence, it is critical to monitor, audit, control, and manage privileged account usage. Many organizations, including financial sector companies, face challenges managing privileged accounts. In response to this potential threat, the Federal Financial Institutions Examination Council (FFIEC) Cyber Assessment Tool (CAT) has specified privileged accounts be tightly controlled.

The goal of this project is to demonstrate a PAM capability that effectively protects, monitors, and manages privileged account access to include their life cycle management, authentication, authorization, auditing, and access controls. This project will result in a freely available NIST Cybersecurity Practice Guide which includes a reference design, fully implemented example solution, and a detailed guide of practical steps needed to implement the solution.

### KEYWORDS

Access control, auditing, authentication, authorization, life cycle management, multifactor authentication, PAM, Privileged Account Management, provisioning management

### DISCLAIMER

Certain commercial entities, equipment, products, or materials may be identified in this document in order to describe an experimental procedure or concept adequately. Such identification is not intended to imply recommendation or endorsement by NIST or NCCoE, nor is it intended to imply that the entities, equipment, products, or materials are necessarily the best available for the purpose.

### COMMENTS ON NCCoE DOCUMENTS

Organizations are encouraged to review all draft publications during public comment periods and provide feedback. All publications from NIST's National Cybersecurity Center of Excellence are available at <http://nccoe.nist.gov>.

Comments on this publication may be submitted to: [financial\\_nccoe@nist.gov](mailto:financial_nccoe@nist.gov)

Public comment period: October 12, 2017 to November 13, 2017

## TABLE OF CONTENTS

|          |  |           |
|----------|--|-----------|
| <b>1</b> | <b>Executive Summary</b> .....                       | <b>1</b>  |
|          | Purpose .....  | 1         |
|          | Scope .....  | 1         |
|          | Assumptions .....                                    | 2         |
|          | Background .....                                     | 2         |
| <b>2</b> | <b>Scenarios</b> .....                               | <b>2</b>  |
|          | Scenario 1: Directory Administrator .....            | 2         |
|          | Scenario 2: Web Server Administrator .....           | 3         |
|          | Scenario 3: Network Administrator .....              | 3         |
|          | Scenario 4: Security Analyst .....                   | 3         |
|          | Scenario 5: High Impact System Access .....          | 3         |
| <b>3</b> | <b>High-Level Architecture</b> .....                 | <b>3</b>  |
|          | Component List .....                                 | 3         |
|          | Desired Requirements .....                           | 4         |
| <b>4</b> | <b>Relevant Standards and Guidance</b> .....         | <b>5</b>  |
| <b>5</b> | <b>Security Control Map</b> .....                    | <b>5</b>  |
|          | <b>Appendix A – References</b> .....                 | <b>16</b> |
|          | <b>Appendix B - Acronyms and Abbreviations</b> ..... | <b>17</b> |

# 1 EXECUTIVE SUMMARY

## 2 Purpose

3 This document describes an NCCoE project focused on securing the use of privileged accounts  
4 for which we are seeking public feedback.

5 The purpose of this project is to provide guidance and demonstrate the secure use and  
6 management of privileged accounts also referred to Privileged Account Management (PAM).  
7 PAM is the aspect of identity and access management that addresses administrative  
8 accounts/users within an organization. Many privileged accounts provide the “keys to the  
9 kingdom” for attackers or malicious insiders as these accounts provide elevated, often  
10 unrestricted access to corporate resources and critical systems (e.g. “crown jewels”), beyond  
11 what a regular user would have. Many successful cyber-attacks have made use of privileged  
12 accounts to gain access to information or systems of interest resulting in data breaches. In  
13 response to these reported breaches, the Federal Financial Institutions Examination Council  
14 (FFIEC) Cybersecurity Assessment Tool (CAT) has prescribed that privileged accounts be tightly  
15 controlled.

16 Many organizations, including financial services companies face challenges managing privileged  
17 accounts. These challenges include:

- 18 • controlling and monitoring (and auditing) use of these accounts
- 19 • ensuring personal accountability among privileged users
- 20 • enforcing least privilege and separation of duties policies

21 This project aims to help organizations in the financial sector design and implement a PAM  
22 system that controls access to and monitors privileged accounts, controls what users can do  
23 using privileged account access, and manage the lifecycle of privileged accounts.

24 The publication of this Project Description is the beginning of a process that will identify project  
25 collaborators, as well as standards-based, commercially available, and /or open-source  
26 hardware and software components. These products will be integrated and implemented in a  
27 laboratory environment to build open, standards-based, modular, end-to-end reference designs  
28 that will address the security challenges of privileged accounts. The approach may include  
29 architectural definition, logical design, build development, security analysis, test and evaluation,  
30 security control mapping, and future build considerations. The output of the process will be the  
31 publication of a multi-volume NIST Cybersecurity Practice Guide that will help financial sector  
32 companies implement stronger controls for privileged account security.

## 33 Scope

34 The scope of the project will include management and control of privileged accounts used to  
35 administer the IT infrastructure. The resulting example solution will include implementation of:

- 36 • applications, operating systems, database systems, network infrastructure, etc.
- 37 • cloud services (XaaS) (software, infrastructure, platform, etc. as a service)
- 38 • users with permission to perform transactions that can materially affect an  
39 organization’s ability to operate (large financial transactions, large security trades, social  
40 media accounts, etc.)
- 41 • activity logging (textual and video)

- 42 • typical administrative users

### 43 **Assumptions**

44 The example solution of PAM will provide numerous security benefits including the reduction of  
45 privileged user access to sensitive information without compromising their ability to perform job  
46 tasks. The NCCoE assumes that organizations will perform a risk assessment to determine the  
47 risk reduction value of an investment in one or more of the PAM system capabilities included in  
48 the reference architecture.

49 A key assumption is that all potential adopters of this project or any of its components have  
50 policies describing the separation of duties and least privilege for administrative/privileged  
51 users.

### 52 **Background**

53 The project was chosen based on discussions with leaders from organizations within financial  
54 sector as well financial sector associations regarding the high priority cybersecurity issues they  
55 face. The lack of self-protection in the information technology infrastructure (IT) elements  
56 (networking systems, applications, and operating systems) forces organizations to limit access to  
57 these systems. Accounts (typically called privileged accounts) with access to these systems allow  
58 users to make changes (including file or system change, deletion, and creation) that can cause  
59 disruption within an organization. The accounts are typically referred to as administrators.  
60 Disruption can include, but is not limited to, data destruction, data exfiltration, and system  
61 failure. Any of these situations could significantly impact or eliminate the ability of the  
62 organization to continue operations. Because of the lack of self-protection within systems,  
63 organizations develop policies for separation of duties and least privilege. The policies apply to  
64 all users including privileged users. Because of the level of access administrators are trusted  
65 with, their access to the information technology infrastructure needs to be monitored and  
66 controlled.

67 Companies also face the following issues with respect to privileged accounts:

- 68 • regulatory compliance (monitoring, managing, and auditing activity)
- 69 • insider malicious activities
- 70 • abuse of rights
- 71 • employee mistakes
- 72 • securing administrative access to cloud infrastructure
- 73 • malware account escalation and account take over
- 74 • 3<sup>rd</sup> party access management

## 75 **2 SCENARIOS**

76 The following scenarios have been used to developed this project description. They will become  
77 the use cases for design of the reference architecture.

### 78 **Scenario 1: Directory Administrator**

79 From time to time directories need to be updated or modified. For example, a new application  
80 account may need to be added to support a new or modified application.

81 **Scenario 2: Web Server Administrator**

82 Web server administrator updating the server OS.

83 **Scenario 3: Network Administrator**

84 Network administrator making changes to a firewall.

85 **Scenario 4: Security Analyst**

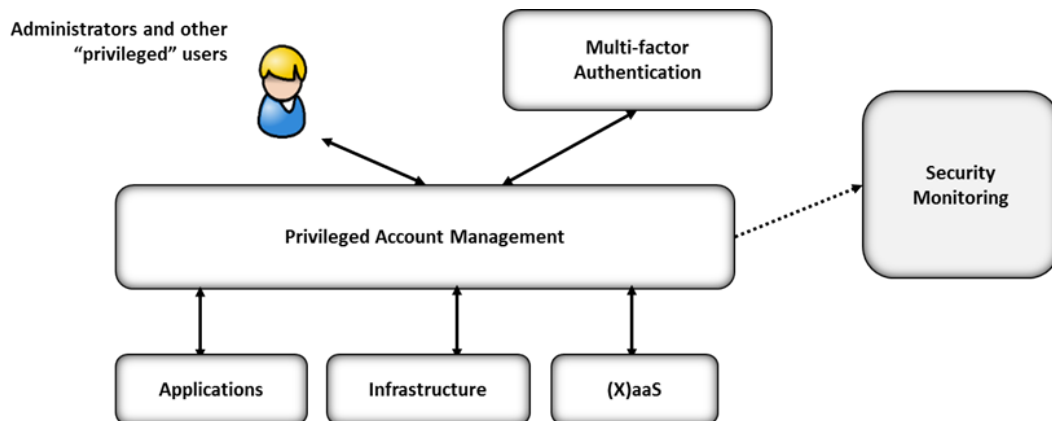
86 Security analyst accessing system logs as part of a security incident.

87 **Scenario 5: High Impact System Access**

88 Authorized Federal Reserve Discount Window transactions or any other exchange or financial  
89 transactions that have the potential for a significant impact to the organization's ability to  
90 operate normally. This could also apply to social media account access control.

91 **3 HIGH-LEVEL ARCHITECTURE**

92 The high-level architecture diagram (below) introduces privileged account management into the  
93 information technology infrastructure of an organization between the IT elements and their  
94 privileged users (administrators). The reference architecture addresses the scope as noted in  
95 section 1 and the desired requirements noted below.



96

97 **Component List**

98 The NCCoE has a lab environment for hosting development of the example solution including  
99 the following features:

- 100
- 101
- 102
- 103
- network with machines using a directory service
  - virtualization servers
  - network switches
  - remote access solution with Wi-Fi and VPN

104 Collaboration partners (participating vendors) will need to provide specialized components and  
105 capabilities to realize this solution including, but not limited to:

- 106
- 107
- 108
- privileged account control
  - privileged account command filtering (allow or deny specific commands, such as disk formatting)

- 109 • multifactor authentication capability
- 110 • access logging/database system
- 111 • password management
- 112 • separation of duties management
- 113 • support least privileged policies
- 114 • password obfuscation (hiding passwords from PAM users)
- 115 • temporary accounts
- 116 • Log management (analytics, storage, alerting)

117

### 118 **Desired Requirements**

119 The security capabilities, behaviors, and life cycle security requirements of the solution are  
120 identified in the following list<sup>1</sup>:

- 121 • easy to use for both PAM system administrators and PAM system users
- 122 • protection for data at rest and data in transit
- 123 • complementary to existing access management
- 124 • integrates with directories
- 125 • account use control (policy enforcement and decision making)
- 126 • system command control
- 127 • password obfuscation (hidden passwords)
- 128 • password management (vaults, changes, storage)
- 129 • activity logging (textual and video)
- 130 • real time activity monitoring
- 131 • support typical user
- 132 • privilege escalation management
- 133 • forensic investigation data management
- 134 • workflow management
- 135 • emergency (break glass) scenario support
- 136 • policy management
- 137 • single sign-on
- 138 • system and privileged account discovery

---

<sup>1</sup> Security Capabilities and Behaviors and Life Cycle Security are two of the major design principles described in the NIST Special Publication 800-130 *Systems Security Engineering Considerations for a Multidisciplinary Approach in the Engineering of Trustworthy Secure Systems*.

#### 139 4 RELEVANT STANDARDS AND GUIDANCE

- 140 • PCI/DSS version 3.2
- 141 [https://www.pcisecuritystandards.org/document\\_library](https://www.pcisecuritystandards.org/document_library)
- 142 Federal Financial Institutions Examination Council (FFIEC) Cybersecurity Assessment Tool
- 143 (CAT)
- 144 <https://www.ffiec.gov/cyberassessmenttool.htm>
- 145 • NIST 800-53 rev 4
- 146 <http://csrc.nist.gov/publications/PubsSPs.html>
- 147 • ANSI INCITS 359-2004 American National Standard for Information Technology – Role
- 148 Based Access Control
- 149 <http://csrc.nist.gov/groups/SNS/rbac/>
- 150 • RFC 4245 The Secure Shell (SSH) Connection Protocol
- 151 <https://www.ietf.org/rfc/rfc4254.txt>
- 152 • RFC 5246 Transport Layer Security Protocol
- 153 <https://tools.ietf.org/html/rfc5246>

#### 154 5 SECURITY CONTROL MAP

155 This table maps the characteristics of the commercial products that the NCCoE will apply  
156 to this cybersecurity challenge to the applicable standards and best practices described  
157 in the Framework for Improving Critical Infrastructure Cybersecurity (CSF), and FFIEC  
158 guidance. This exercise is meant to demonstrate the real-world applicability of  
159 standards and best practices, but does not imply that products with these  
160 characteristics will meet your industry's requirements for regulatory approval or  
161 accreditation.



162 Table 1: Security Control Map

| Function      | Category   | Subcategory  | Informative References       |              |                       |                                    |   |                    |
|---------------|--|--|------------------------------|--------------|-----------------------|------------------------------------|---|--------------------|
|               |  |  | FFIEC CAT                    | CCS CSC 2016 | COBIT 5               | ISO/IEC 27001:2013                 | NIST SP 800-53 Rev. 4                           | PCI-DSS 3.0        |
| IDENTIFY (ID) | <b>Asset Management (ID.AM):</b> The data, personnel, devices, systems, and facilities that enable the organization to achieve business purposes are identified and managed consistent with their relative importance to business objectives and the organization's risk strategy. | <b>ID.AM-3:</b><br>Organizational communication and data flows are mapped  | D4.C.Co.B.4<br>D4.C.Co.Int.1 | 1            | DSS05.02              | A.13.2.1                           | AC-4, CA-3, CA-9, PL-8                          | 1.1, 1.2, 1.3, 2.4 |
|               |  | <b>ID.AM-6:</b><br>Cybersecurity roles and responsibilities for the entire workforce and third-party stakeholders (e.g., suppliers, customers, partners) are established | D1.R.St.B.1<br>D1.TC.Cu.B.1  |              | APO01.02,<br>DSS06.03 | A.6.1.1                            | CP-2, PS-7, PM-11                               |                    |
|               | <b>Business Environment (ID.BE):</b> The organization's mission, objectives, stakeholders, and activities are understood and prioritized; this information is used to inform cybersecurity roles, responsibilities, and risk management decisions.                                 | <b>ID.BE-4:</b><br>Dependencies and critical functions for delivery of critical services are established   | D4.C.Co.B.1<br>D1.G.IT.B.2   |              |                       | A.11.2.2,<br>A.11.2.3,<br>A.12.1.3 | CP-8, PE-9, PE-11, PM-8, SA-14                  |                    |
|               |  | <b>ID.BE-5:</b> Resilience requirements to support delivery of critical services are established   | D5.IR.Pl.B.5<br>D5.IR.Pl.E.3 |              |                       | DSS04.02                           | A.11.1.4,<br>A.17.1.1,<br>A.17.1.2,<br>A.17.2.1 | CP-2, CP-11, SA-14 |

| Function | Category  | Subcategory  | Informative References  |                 |                                    |                       |                                |  |
|----------|---|--|---|-----------------|------------------------------------|-----------------------|--------------------------------|--|
|          |   |  | FFIEC CAT   | CCS CSC<br>2016 | COBIT 5                            | ISO/IEC<br>27001:2013 | NIST SP<br>800-53 Rev.<br>4    | PCI-DSS<br>3.0   |
|          | <b>Governance (ID.GV):</b><br>The policies, procedures, and processes to manage and monitor the organization's regulatory, legal, risk, environmental, and operational requirements are understood and inform the management of cybersecurity risk. | <b>ID.GV-1:</b><br>Organizational information security policy is established   | D1.G.SP.B.4   |                 | APO01.03,<br>EDM01.01,<br>EDM01.02 | A.5.1.1               | - 1 controls from all families | 1.5, 2.1, 2.2, 2.5, 2.6, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 5.1, 5.2, 5.4, 6.7, 7.3, 8.1, 8.8, 9.6, 9.10, 10.7, 10.9, 11.6, 12.1, 12.3, 12.4, 12.5, 12.8 |
|          |   | <b>ID.GV-2:</b><br>Information security roles & responsibilities are coordinated and aligned with internal roles and external partners | D1.G.SP.B.7<br>D4.RM.Co.B.2<br>D4.RM.Co.B.5                               |                 | APO13.12                           | A.6.1.1,<br>A.7.2.1   | PM-1, PS-7                     | 12.4   |
|          |   | <b>ID.GV-4:</b><br>Governance and risk management processes address cybersecurity risks  | D1.G.Ov.B.1<br>D1.G.Ov.B.3<br>D1.G.Ov.E.1<br>D1.G.SP.E.1<br>D1.G.Ov.Int.1 |                 | DSS04.02                           |                       | PM-9, PM-11                    |  |

| Function     | Category   | Subcategory  | Informative References                          |                      |                                    |   |                                     |              |
|--------------|--|--|---|----------------------|------------------------------------|---|-------------------------------------|--------------|
|              |  |  | FFIEC CAT                                       | CCS CSC 2016         | COBIT 5                            | ISO/IEC 27001:2013  | NIST SP 800-53 Rev. 4               | PCI-DSS 3.0  |
|              | <b>Risk Assessment (ID.RA):</b> The organization understands the cybersecurity risk to organizational operations (including mission, functions, image, or reputation), organizational assets, and individuals. | <b>ID.RA-6:</b> Risk responses are identified and prioritized  | D5.IR.Pl.B.1<br>D5.DR.Re.E.1<br>D5.IR.Pl.E.1    |                      | APO12.05,<br>APO13.02              |   | PM-4, PM-9                          |              |
| PROTECT (PR) | <b>Access Control (PR.AC):</b> Access to assets and associated facilities is limited to authorized users, processes, or devices, and to authorized activities and transactions.                                | <b>PR.AC-1:</b> Identities and credentials are managed for authorized devices and users                                  | D3.PC.Im.B.7<br>D3.PC.Am.B.6                    | 16                   | DSS05.04,<br>DSS06.03              | A.9.2.1,<br>A.9.2.2,<br>A.9.2.4,<br>A.9.3.1,<br>A.9.4.2,<br>A.9.4.3 | AC-2, IA Family                     | 8.1-8.7      |
|              |  | <b>PR.AC-3:</b> Remote access is managed   | D3.PC.Am.B.15<br>D3.PC.De.E.7<br>D3.PC.Im.Int.2 | 12                   | APO13.01,<br>DSS01.04,<br>DSS05.03 | A.6.2.2,<br>A.13.1.1,<br>A.13.2.1                                   | AC-17, AC-19, AC-20                 | 7.1, 7.2     |
|              |  | <b>PR.AC-4:</b> Access permissions are managed, incorporating the principles of least privilege and separation of duties | 3.PC.Am.B.1<br>D3.PC.Am.B.2<br>D3.PC.Am.B.5     | 5, 12, 14,<br>15, 16 |                                    | A.6.1.2,<br>A.9.1.2,<br>A.9.2.3,<br>A.9.4.1,<br>A.9.4.4             | AC-2, AC-3,<br>AC-5, AC-6,<br>AC-16 | 3.5, 8.1-8.7 |

| Function   | Category  | Subcategory   | Informative References  |                       |  |                                    |                       |                             |
|--|---|---|---|-----------------------|--|------------------------------------|-----------------------|-----------------------------|
|  |   |   | FFIEC CAT   | CCS CSC 2016          | COBIT 5  | ISO/IEC 27001:2013                 | NIST SP 800-53 Rev. 4 | PCI-DSS 3.0                 |
|  |   | <b>PR.AC-5:</b> Network integrity is protected, incorporating network segregation where appropriate | D3.DC.Im.B.1<br>D3.DC.Im.Int.1                                | 9, 11, 12,<br>13, 14  |  | A.13.1.1,<br>A.13.1.3,<br>A.13.2.1 | AC-4, SC-7            | 1.4                         |
|  | <b>Data Security (PR.DS):</b> Information and records (data) are managed consistent with the organization's risk strategy to protect the confidentiality, integrity, and availability of information. | <b>PR.DS-1:</b> Data-at-rest is protected   | D1.G.IT.B.13<br>D3.PC.Am.B.14<br>D4.RM.Co.B.1<br>D3.PC.Am.A.1 | 14, 17                | APO01.06,<br>BAI02.01,<br>BAI06.01,<br>DSS06.06                          | A.8.2.3                            | SC-28                 | 3.3, 3.4, 3.5,<br>4.1 - 4.3 |
| <b>PR.DS-2:</b> Data-in-transit is protected                           |   | D3.PC.Am.B.13<br>D3.PC.Am.E.5<br>D3.PC.Am.Int.7   | 13, 14, 17  | APO01.06,<br>DSS06.06 | A.8.2.3,<br>A.13.1.1,<br>A.13.2.1,<br>A.13.2.3,<br>A.14.1.2,<br>A.14.1.3 | SC-8                               | 2.3                   |                             |
| <b>PR.DS-4:</b> Adequate capacity to ensure availability is maintained |   | D5.IR.Pl.B.5<br>D5.IR.Pl.B.6<br>D5.IR.Pl.E.3<br>D3.PC.Im.E.4  |   | APO13.01              | A.12.3.1   | AU-4, CP-2,<br>SC-5                |                       |                             |
|  |   |   |   |                       |  |                                    |                       |                             |

| Function | Category  | Subcategory  | Informative References  |              |          |   |  |             |
|----------|---|--|---|--------------|----------|---|--|-------------|
|          |   |  | FFIEC CAT   | CCS CSC 2016 | COBIT 5  | ISO/IEC 27001:2013  | NIST SP 800-53 Rev. 4  | PCI-DSS 3.0 |
|          |   | <b>PR.DS-5:</b> Protections against data leaks are implemented   | D3.PC.Am.B.15<br>D3.PC.Am.Int.1<br>D3.PC.De.Int.1<br>D3.DC.Ev.Int.1 | 13, 17       | APO01.06 | A.6.1.2,<br>A.7.1.1,<br>A.7.1.2,<br>A.7.3.1,<br>A.8.2.2,<br>A.8.2.3,<br>A.9.1.1,<br>A.9.1.2,<br>A.9.2.3,<br>A.9.4.1,<br>A.9.4.4,<br>A.9.4.5,<br>A.13.1.3,<br>A.13.2.1,<br>A.13.2.3,<br>A.13.2.4,<br>A.14.1.2,<br>A.14.1.3 | AC-4, AC-5,<br>AC-6, PE-19,<br>PS-3, PS-6,<br>SC-7, SC-8,<br>SC-13, SC-31,<br>SI-4 | 1.3         |
|          | <b>Maintenance (PR.MA):</b> Maintenance and repairs of industrial control and information system components is performed consistent with policies and procedures. | <b>PR.MA-1:</b> Maintenance and repair of organizational assets is performed and logged in a timely manner, with approved and controlled tools | D3.CC.Re.Int.5<br>D3.CC.Re.Int.6                                    |              | BAI09.03 | A.11.1.2,<br>A.11.2.4,<br>A.11.2.5  | MA-2, MA-3,<br>MA-5  | 5.2, 6.2    |

| Function | Category  | Subcategory  | Informative References                      |                 |          |  |                             |                                 |
|----------|---|--|---|-----------------|----------|--|-----------------------------|---------------------------------|
|          |   |  | FFIEC CAT                                   | CCS CSC<br>2016 | COBIT 5  | ISO/IEC<br>27001:2013  | NIST SP<br>800-53 Rev.<br>4 | PCI-DSS<br>3.0                  |
|          |   | <b>PR.MA-2:</b> Remote maintenance of organizational assets is approved, logged, and performed in a manner that prevents unauthorized access | D3.PC.Im.B.7                                | 5, 12           | DSS05.04 | A.11.2.4,<br>A.15.1.1,<br>A.15.2.1                           | MA-4                        | 6.2                             |
|          | <b>Protective Technology (PR.PT):</b> Technical security solutions are managed to ensure the security and resilience of systems and assets, consistent with related | <b>PR.PT-1:</b> Audit/log records are determined, documented, implemented, and reviewed in accordance with policy                            | D1.G.SP.B.3<br>D2.MA.Ma.B.1<br>D2.MA.Ma.B.2 | 6, 14           | APO11.04 | A.12.4.1,<br>A.12.4.2,<br>A.12.4.3,<br>A.12.4.4,<br>A.12.7.1 | AU Family                   | 5.2, 6.6, 9.6,<br>9.7,10.1-10.9 |

| Function | Category                                 | Subcategory   | Informative References  |                 |          |                       |                             |                       |
|----------|--|---|---|-----------------|----------|-----------------------|-----------------------------|-----------------------|
|          |  |   | FFIEC CAT   | CCS CSC<br>2016 | COBIT 5  | ISO/IEC<br>27001:2013 | NIST SP<br>800-53 Rev.<br>4 | PCI-DSS<br>3.0        |
|          | policies, procedures,<br>and agreements. | <b>PR.PT-3:</b> Access to<br>systems and assets is<br>controlled,<br>incorporating the<br>principle of least<br>functionality | D3.PC.Am.B.7<br>D3.PC.Am.B.4<br>D3.PC.Am.B.3:<br>D4.RM.Om.Int.1 | 5, 14, 16       | DSS05.02 | A.9.1.2               | AC-3, CM-7                  | 1.3, 3.5, 7.1,<br>7.2 |

| Function           | Category   | Subcategory   | Informative References                          |              |                       |                       |  |                           |
|--------------------|--|---|---|--------------|-----------------------|-----------------------|--|---------------------------|
|                    |  |   | FFIEC CAT                                       | CCS CSC 2016 | COBIT 5               | ISO/IEC 27001:2013    | NIST SP 800-53 Rev. 4                    | PCI-DSS 3.0               |
|                    |  | <b>PR.PT-4:</b><br>Communications and control networks are protected  | D3.PC.Im.B.1<br>D3.PC.Am.B.11<br>D3.PC.Im.Int.1 | 7, 11        | DSS05.02,<br>APO13.01 | A.13.1.1,<br>A.13.2.1 | AC-4, AC-17, AC-18,<br>CP-8, SC-7        | 1.1, 1.2                  |
| <b>DETECT (DE)</b> | <b>Anomalies and Events (DE.AE):</b> Anomalous activity is detected in a timely manner and the potential impact of events is understood. | <b>DE.AE-1:</b> A baseline of network operations and expected data flows for users and systems is established and managed | D3.DC.Ev.B.1<br>D4.C.Co.B.4                     | 9, 12        | DSS03.01              |                       | AC-4, CA-3,<br>CM-2, SI-4                | 1.1, 1.2, 11.4            |
|                    |  | <b>DE.AE-2:</b> Detected events are analyzed to understand attack targets and methods                                     | D5.IR.Pl.Int.4                                  | 19           |                       | A.16.1.1,<br>A.16.1.4 | AU-6, CA-7,<br>IR-4, SI-4                | 10.4                      |
|                    |  | <b>DE.AE-3:</b> Event data are aggregated and correlated from multiple sources and sensors                                | D3.DC.Ev.E.1                                    | 6            |                       |                       | AU-6, CA-7,<br>IR-4, IR-5,<br>IR-8, SI-4 | 10.1, 10.2,<br>10.3, 10.4 |



| Function  | Category   | Subcategory  | Informative References                          |              |          |  |  |             |
|---|--|--|---|--------------|----------|--|--|-------------|
|   |  |  | FFIEC CAT                                       | CCS CSC 2016 | COBIT 5  | ISO/IEC 27001:2013                               | NIST SP 800-53 Rev. 4                  | PCI-DSS 3.0 |
|   |  | <b>DE.AE-5:</b> Incident alert thresholds are established                                | D5.DR.De.B.1<br>D3.DC.An.E.4.<br>D3.DC.An.Int.3 | 19           | APO12.06 |  | IR-4, IR-5,<br>IR-8                    | 10.6        |
|   | <b>Security Continuous Monitoring (DE.CM):</b><br>The information system and assets are monitored at discrete intervals to identify cybersecurity events and verify the effectiveness of protective measures.<br><br><b>Detection Processes (DE.DP):</b> Detection processes and procedures are maintained and tested to ensure timely and adequate awareness of anomalous events. | <b>DE.CM-3:</b> Personnel activity is monitored to detect potential cybersecurity events | D3.DC.An.A.3                                    | 19           |          | A.12.4.1   | AC-2, AU-12, AU-13, CA-7, CM-10, CM-11 | 10.1, 10.3  |
| <b>DE.CM-7:</b><br>Monitoring for unauthorized personnel, connections, devices, and software is performed |  | D3.DC.Ev.B.3   | 19  |              |          | AU-12, CA-7, CM-3, CM-8, PE-3, PE-6, PE-20, SI-4 | 5.1, 11.4                              |             |
| <b>DE.DP-4:</b> Event detection information is communicated to appropriate parties                        |  | D3.DC.Ev.B.2<br>D5.ER.Is.B.1<br>D5.ER.Is.E.1   | 6   | APO12.06     | A.16.1.2 | AU-6, CA-2, CA-7, RA-5, SI-4                     |  |             |

| Function     | Category   | Subcategory  | Informative References                       |              |         |                      |                       |             |
|--------------|--|--|--|--------------|---------|----------------------|-----------------------|-------------|
|              |  |  | FFIEC CAT                                    | CCS CSC 2016 | COBIT 5 | ISO/IEC 27001:2013   | NIST SP 800-53 Rev. 4 | PCI-DSS 3.0 |
| RESPOND (RS) | <b>Communications (RS.CO):</b> Response activities are coordinated with internal and external stakeholders, as appropriate, to include external support from law enforcement agencies. | <b>RS.CO-2:</b> Events are reported consistent with established criteria | D5.IR.PI.B.2<br>D5.DR.Re.B.4<br>D5.ER.Es.B.4 | 19           |         | A.6.1.3,<br>A.16.1.2 | AU-6, IR-6,<br>IR-8   |             |

163

## APPENDIX A – REFERENCES

- [1] FFIEC Cybersecurity Assessment Tool (CAT)
- [2] FFIEC Information Security Handbook

## APPENDIX B - ACRONYMS AND ABBREVIATIONS

|       |  |
|-------|--|
| CSF   | Cybersecurity Framework                            |
| NCCoE | National Cybersecurity Center of Excellence        |
| NIST  | National Institute of Standards and Technology     |
| IdAM  | Identity and Access Management                     |
| PAM   | Privileged account Management                      |
| FFIEC | Federal Financial Institutions Examination Council |
| CAT   | Cybersecurity Assessment Tool                      |