

Designing and Building a Cybersecurity Program

Based on NIST Cybersecurity Framework



Part 1: Background and Introduction

Part 1: Background & Introduction

Lesson 1: Framing the Problem
Lesson 2: The Controls Factory Model

**Part 2: The Controls Factory
The Engineering Office**

Lesson 3: The Threats and Vulnerabilities
Lesson 4: Digital Assets, Identities and Business Impact
Lesson 5: The NIST Cybersecurity Framework (CSF) Design & Build

**Part 2: The Controls Factory
The Technology Office**

Lesson 6: The Technology Program Design and Build
Lesson 7: The Security Operations Center
Lesson 8: The Technology Program Test and Assurance

**Part 2: The Controls Factory
The Business Office**

Lesson 9: The Business Program Design and Build
Lesson 10: The Cyber Workforce Skills Development
Lesson 11: The Cyber Risk Program Design and Build

**Part 3: The Program
Deliverables**

Lesson 12: The Cybersecurity Program Details
Lesson 13: The Cyber Risk Program Details

About the Instructor

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University of Massachusetts
Chief Information Security Officer (CISO)



Primary Role

- Design, implement, operate, maintain the UMass Written Information Security Program (WISP)
- Based on the NIST (National Institute of Science and Technology) Cybersecurity Framework (CSF)
- Technical Controls: The CIS (Center for Internet Security) 20 Critical Security Controls
- Business Controls: The ISO 27002 Code of Practice for Information Security Management

Day to Day Responsibilities

- Manage program implementation and compliance reporting
- Communicate security program deliverables and implementation status
- Establish cybersecurity consulting practice and deliver consulting services
- Design and deliver training in cybersecurity program design, cybersecurity operations

Team Accomplishments

- 2016 ISE (Information Security Executive) Program Award Finalist
- 2013 ISE Program Award Winner

Individual Accomplishments

- 2016 Security Magazine Most Influential People in Security
- 2016 ISACA New England Achievement Award
- 2013 SANS Person Who Made a Difference Award in Cybersecurity
- 2013 ISE Individual Award Finalist

Why is Cybersecurity Important

The Why: The Innovation Economy

To reach the full potential of technology and the associated economic benefits, we need to ensure our computing assets (applications, networks, systems, endpoints , etc.) and our information assets are secure, and our digital identities are trusted.

The What: Effective Cybersecurity Program and Cyber Risk Program

- Establish engineering, technical and business requirements
- Establish a Cybersecurity Program based on the NIST Cybersecurity Framework
 - Build and maintain a comprehensive technical solution – 20 Critical Security Controls
 - Build and maintain a comprehensive business solution – ISO 27002:2013 Controls
 - Build and maintain an executive solution - Cyber Risk Program based on the 2017 AICPA Description Criteria

The Who and the How: People, Process and Technology

- Technology: Design, implement, manage a set of technologies that automate the technical controls
- People: Establish a skilled cyber-workforce to manage our technical, business and executive solutions
- Process: Establish roles / responsibilities and best practices at the technical / operational level, the business / management level and the executive / risk level

Today's Innovation Economy

The Business Model



Where the economy is based on knowledge, technology, entrepreneurship, innovation.

Job & Wage Growth



Where job growth and wage growth exceeds the rest of the economy.

Demand for Knowledge



Demand for STEM-capable workforce (computer science, technology engineering, math)

Technology Enablement



Where technology enables innovation and creates economic prosperity.

Entrepreneurship



Individuals and teams create value via determination, leadership, enthusiasm.

Innovation



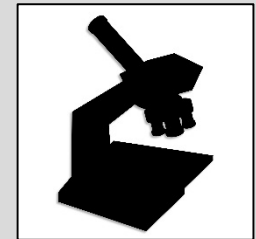
Better solutions that meet new requirements, unarticulated needs, existing market needs

Talent



Set of personal characteristics that enhance one's ability to excel in in a certain endeavor..

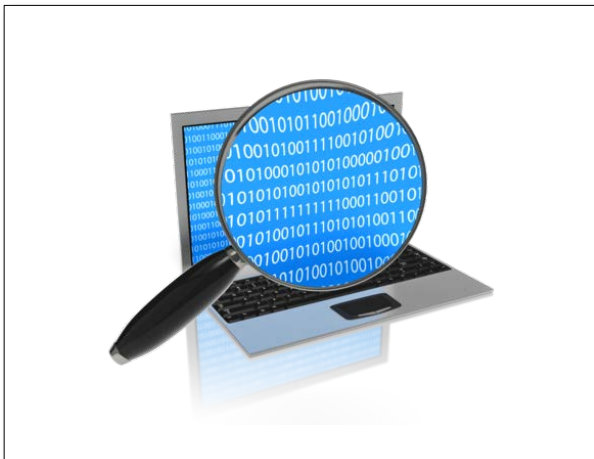
Research & Development



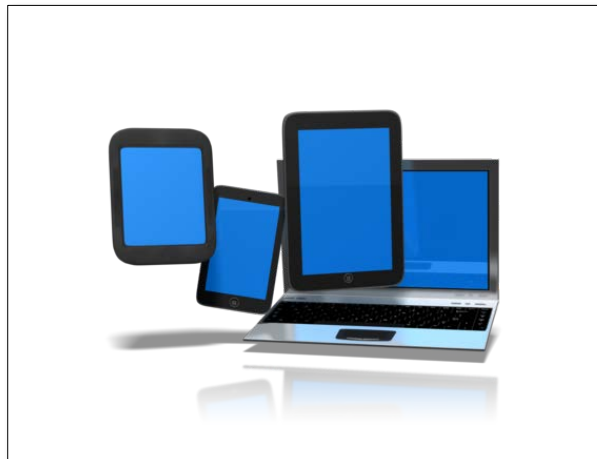
Discovering and applying knowledge to create new and improved products and services.

Areas of growth of an Innovation Economy

Growth in Information



Growth in Devices



Growth in Software



Growth in Cloud



Growth in Outsourcing

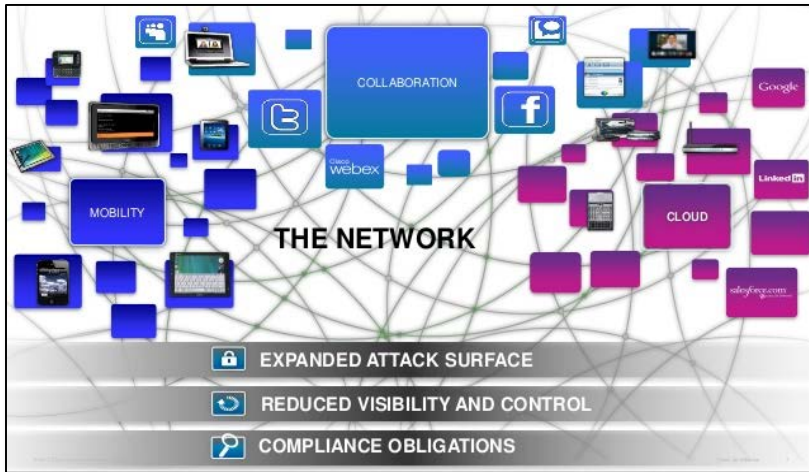


Growth in Threats



The Key Challenges of an Innovation Economy

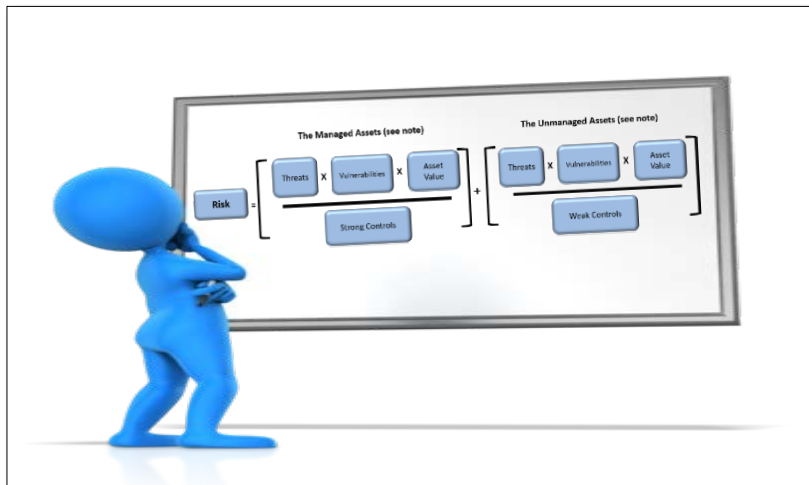
The Key Business Challenges



The Key Technology Challenges



The Key Risk Management Challenges



The Key Workforce Challenges

Cybersecurity Skills Crisis

Too Many Threats

- 62% INCREASE IN BREACHES IN 2013*
- 1 IN 5 ORGANIZATIONS HAVE EXPERIENCED AN APT ATTACK*
- US \$3 TRILLION TOTAL GLOBAL IMPACT OF CYBERCRIME*
- 8 MONTHS IS THE AVERAGE TIME AN ADVANCED THREAT GOES UNNOTICED ON VICTIM'S NETWORK*
- 2.5 BILLION EXPOSED RECORDS AS A RESULT OF A DATA BREACH IN THE PAST 5 YEARS*

Too Few Professionals

- 62% OF ORGANIZATIONS HAVE NOT INCREASED SECURITY TRAINING IN 2014*
- 1 OUT OF 3 SECURITY PROS ARE NOT FAMILIAR WITH ADVANCED PERSISTENT THREATS*
- <2.4% GRADUATING STUDENTS HOLD COMPUTER SCIENCE DEGREES*
- 1 MILLION UNFILLED SECURITY JOBS WORLDWIDE*
- 83% OF ENTERPRISES CURRENTLY LACK THE RIGHT SKILLS AND HUMAN RESOURCES TO PROTECT THEIR IT ASSETS**

Enterprises are under siege from a rising volume of cyberattacks.

At the same time, the global demand for skilled professionals sharply outpaces supply. Unless this gap is closed, organizations will continue to face major risk. Comprehensive educational and networking resources are required to meet the needs of everyone from entry-level practitioners to seasoned professionals.

SOURCES: 1. Increased Other Security Can Save Global Economy, Informs, McKinsey/World Economic Forum, January 2014. 2. M-Trends 2013: Attack the Security Gap, Mandiant, March 2013. 3. Increased Other Security Can Save Global Economy, Informs, McKinsey/World Economic Forum, January 2014. 4. ISACA's 2014 APT Study, ISACA, April 2014. 5. Increased Other Security Can Save Global Economy, Informs, McKinsey/World Economic Forum, January 2014. 6. ISACA's 2014 APT Study, ISACA, April 2013. 7. ISACA's 2014 APT Study, ISACA, April 2014. 8. CIO.org, February 2014. 9. 2014 Cyber Annual Security Report 10. Cybersecurity Skills Press and News Alerts, ESO, March 2014.

What is Vulnerable?

Cyber Attacks Could Put Humans and Infrastructure at Risk

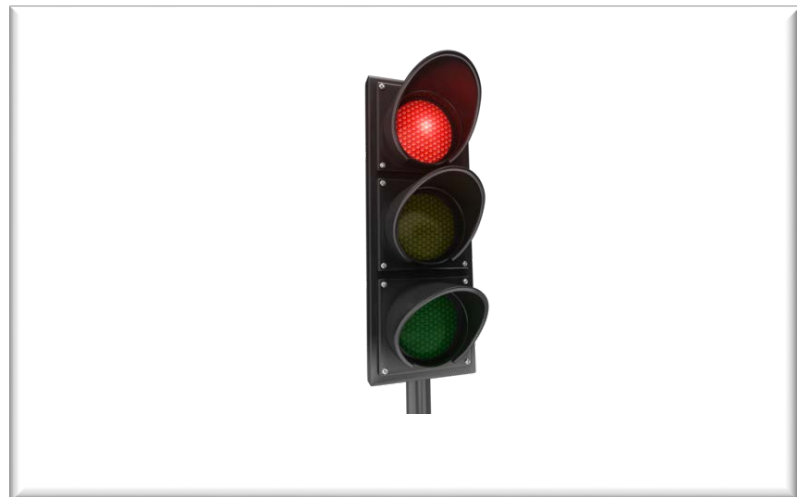


Programmable Logic Control (PLC) Vulnerabilities

Automotive Vulnerabilities (Electronic Control Unit)



Traffic Light Vulnerabilities (Malfunction Management Unit)



Industrial Control Vulnerabilities (Programmable Control Unit)



Medical Device Vulnerabilities (Electronic Control Unit)



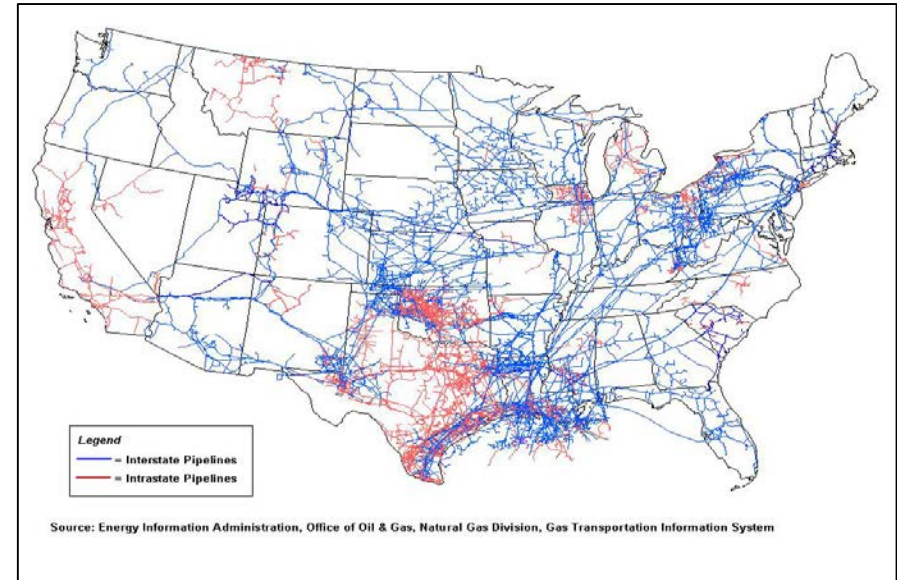
What Has Happened Already?

The Cyberattack in Turkey: Against gas pipeline



- A recently disclosed 2008 targeted attack on the majority BP-owned Baku-Tbilisi-Ceyhan pipeline in Turkey caused an explosion with flames as high as 150 feet.
- At the time, Baku-Tbilisi-Ceyhan was thought to be one of the most secure pipelines in the world.
- Hackers had shut down alarms, cut off communications and super-pressurized the crude oil in the line. The main weapon at valve station 30 on Aug. 5, 2008, was a keyboard..

Could that happen here: U.S. Natural Gas Pipelines



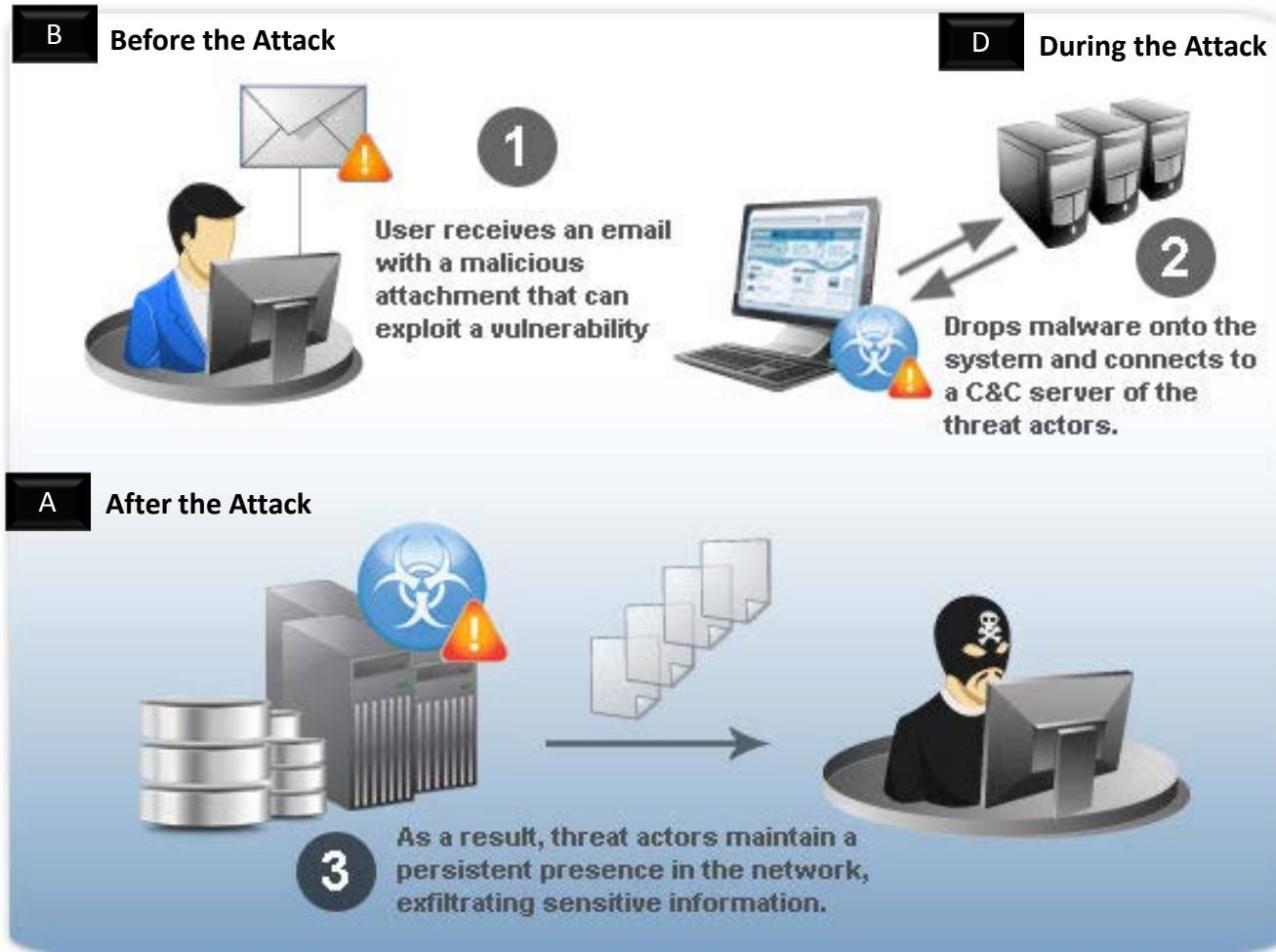
- In the U.S., there are millions of miles of pipelines that distribute everything from oil, hazardous liquids, natural gas and chemicals.
- Many of them are approachable above ground, calling their physical security into question.
- These same pipelines are unquestionably vulnerable to cyberattacks that can inflict the same kind of serious damage as physical attacks.

What are the Consequences?

Critical Infrastructure

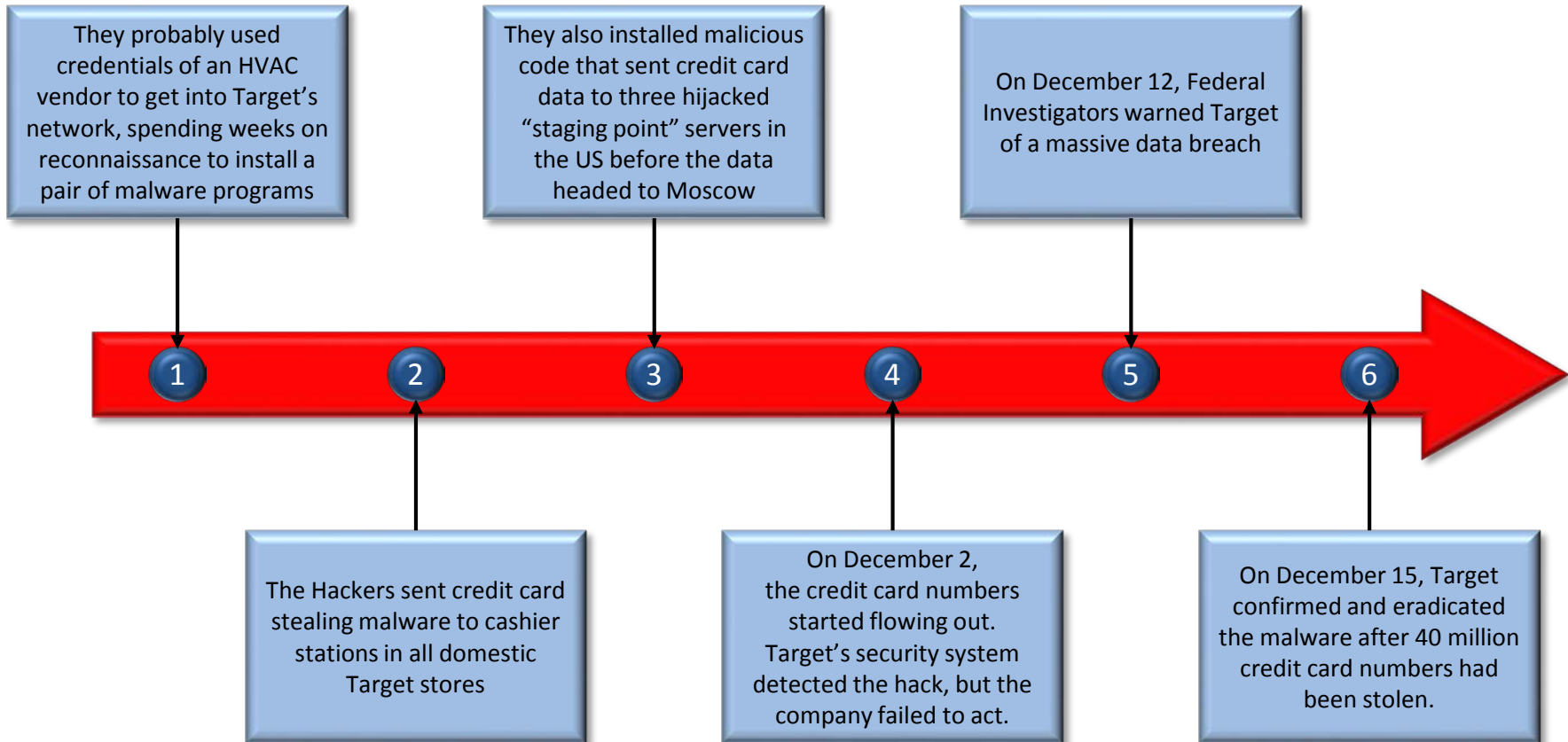


We need to understand How Cyber Attacks Occur

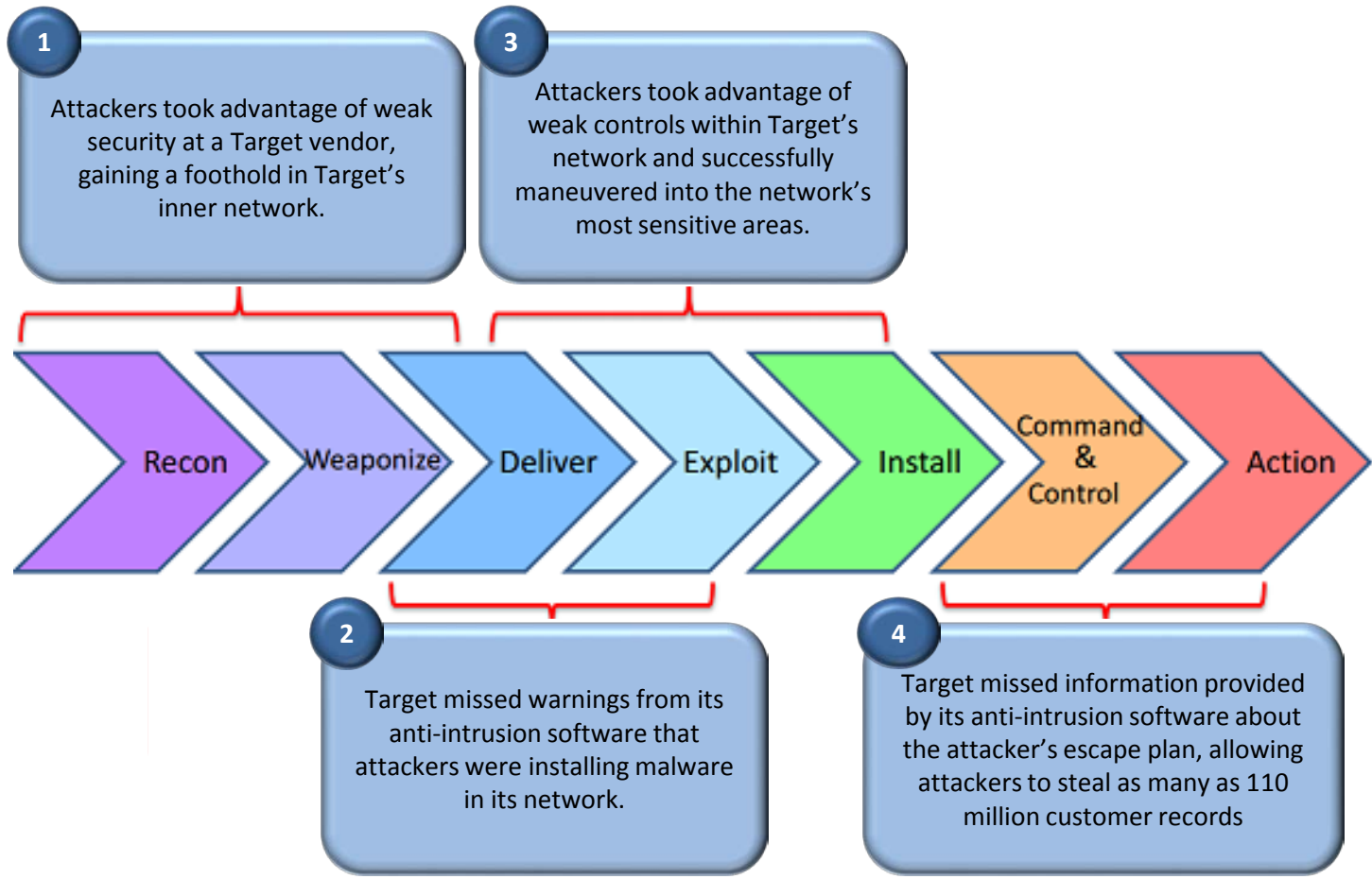


The Target Data Breach Example

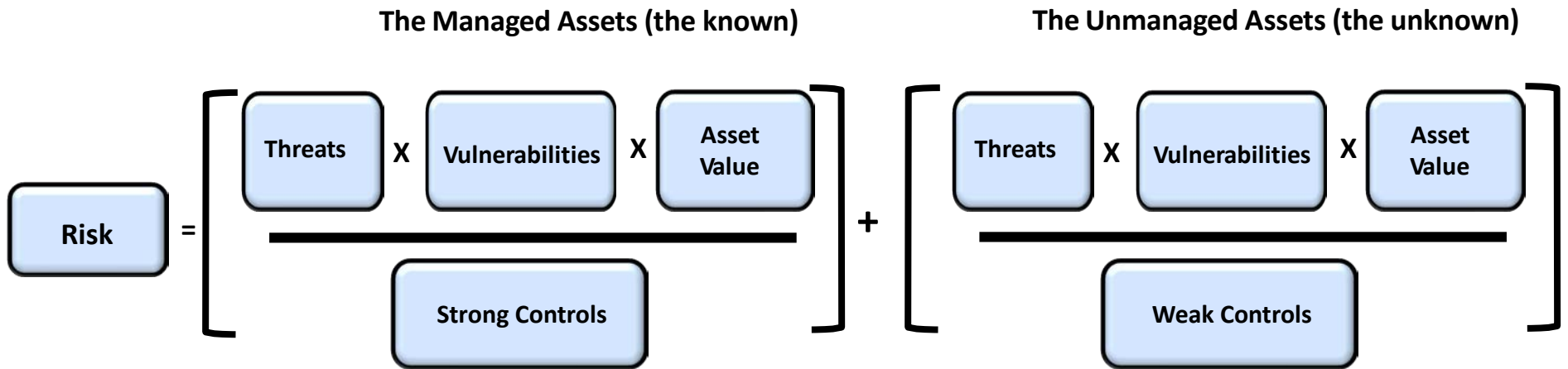
How the Hackers Broke Into Target



Target's Missed Opportunities



The Risk Equation



How do we calculate risk?

1. Threats involve the potential attack against IT resources and information assets
2. Vulnerabilities are weaknesses of IT resources and information that could be exploited by a threat
3. Asset Value is based on criticality of IT resources and information assets
4. Controls are safeguards that protect IT resources and information assets against threats and/or vulnerabilities (see note)
5. Risk is based on the likelihood and impact of a cyber-security incident or data breach

Note: Managed assets imply strong controls; unmanaged assets imply weak controls

What Are the Risks?

The risks are the unknowns

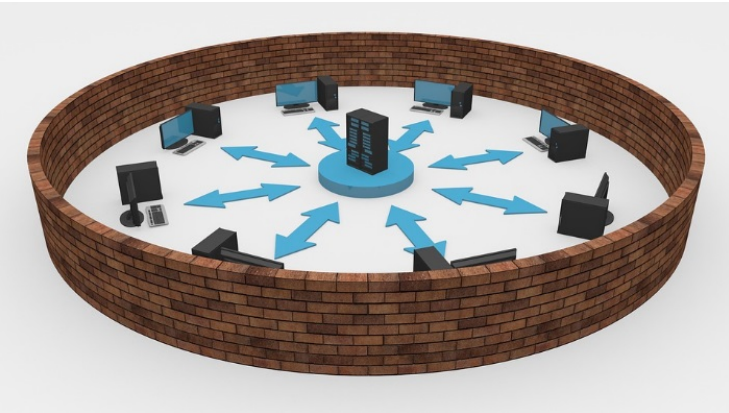
The Risk of Unknown or Undetected Threats



The Risk of Unknown or Unmitigated Vulnerabilities



The Risk of Unknown or Unprotected Assets



The Risk of Unknown, Missing or Ineffective Controls



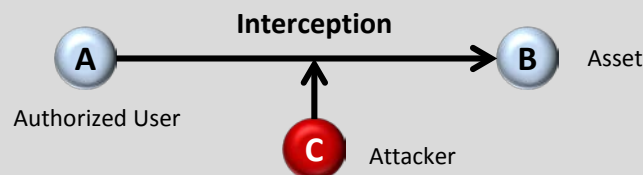
What are the Controls?

The controls are the safeguards

Confidentiality

Attack on Confidentiality (Unauthorized Interception) - An unauthorized individual gains access to an asset

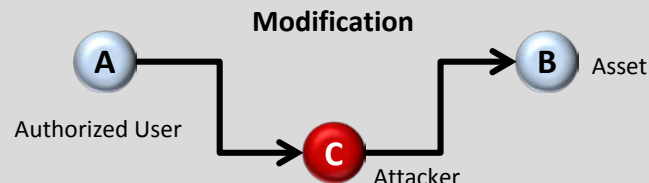
Confidentiality Controls – Ensure only authorized users (*trusted identities*) can access the computer resources and information (*managed assets*)



Integrity

Attack on Integrity (Unauthorized Modification) - An unauthorized individual gains access and tampers with the asset by changing values in a data file, altering a program so it performs differently, etc.

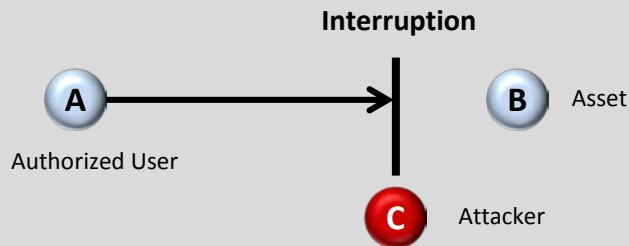
Integrity Controls - Ensure only authorized users can (*trusted identities*) modify the computer resources and information (*managed assets*)



Availability

Attack on Availability (Unauthorized Interruption)- An asset becomes lost, unavailable or unusable to authorized users

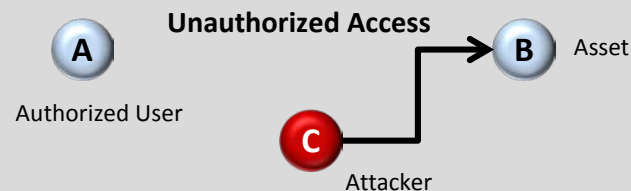
Availability Controls – Ensure assets (*managed assets*) are available to authorized users (*trusted identities*) when needed



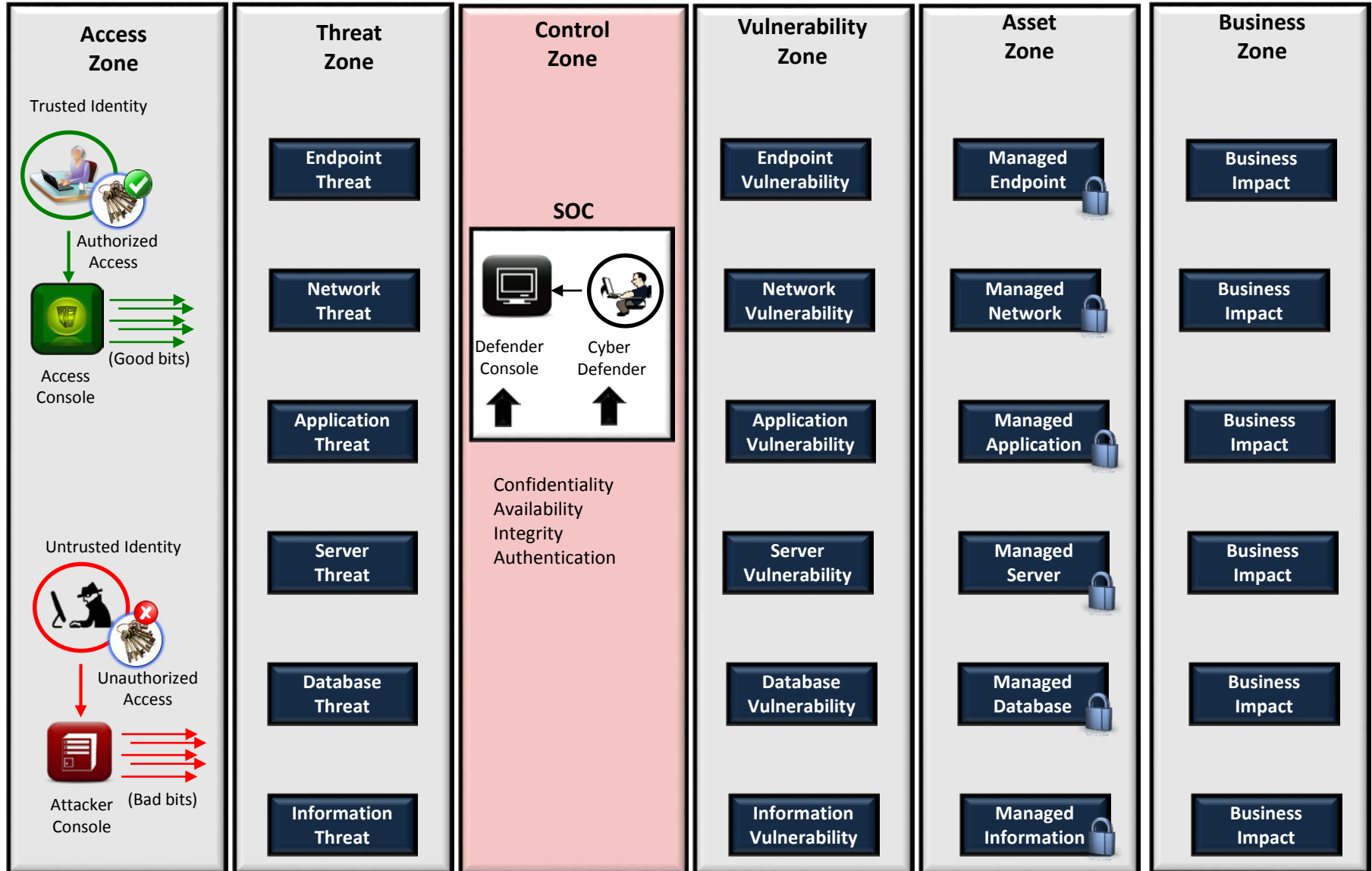
Authentication

Attack on Authentication (Unauthorized Access) - An attacker gains unauthorized access to an asset by using credentials of a known and valid user. As a result, the attacker assumes the privileges of the valid user.

Authentication Controls – Ensure the asset (*managed assets*) is able to verify the identity of an authorized user (*trusted identity*)



The Cyber Attack Model



Build a Room of Controls

To protect our critical assets against known and unknown threats

Trusted Identity



Authorized Access

BUS-01	BUS-02	BUS-03	BUS-04	BUS-05	BUS-06	BUS-07	BUS-08
BUS-09	TEC-01	TEC-02	TEC-03	TEC-04	TEC-05	TEC-06	BUS-10
BUS-11	TEC-07	TEC-08	<p>Managed Assets</p>		TEC-09	TEC-10	BUS-12
BUS-13	TEC-11	TEC-12			TEC-13	TEC-14	BUS-14
BUS-15	TEC-15	TEC-16			TEC-17	TEC-18	BUS-16
BUS-17	TEC-19	TEC-20			TEC-21	TEC-22	BUS-18
BUS-19	TEC-23	TEC-24			TEC-25	TEC-26	TEC-27
BUS-21	BUS-22	BUS-23	BUS-24	BUS-25	BUS-26	BUS-27	BUS-28

B BUS – Business Controls

T TEC – Technical Controls

The NIST Cybersecurity Framework (CSF)

Framework Core

Functions	Categories	Subcategories
Identify	Asset Management (ID.AM) Business Environment (ID.BE) Governance (ID.GV) Risk Assessment (ID.RA) Risk Management (ID.RM)	ID.AM-1 to ID.AM-6 ID.BE-1 to ID.BE-5 ID.GV-1 to ID.GV-4 ID.RA-1 to ID.RA-6 ID.RM-1 to ID.RM-3
Protect	Access Control (PR.AC) Awareness and Training (PR.AT) Data Security (PR.DS) Information Protection Procedures (PR.IP) Maintenance (PR.MA) Protective Technology (PR.PT)	PR.AC-1 to PR.AC-5 PR.AT-1 to PR.AT-5 PR.DS-1 to PR.DS-9 PR.IP-1 to PR.IP-11 PR.MA-1 to PR.MA-2 PR.PT-1 to PR.PT-5
Detect	Anomalies and Events (DE.AE) Security Continuous Monitoring (DE.CM) Detection Processes (DE.DP)	DE.AE-1 to DE.AE-5 DE.CM-1 to DE.CM-8 DE.DP-1 to DE.DP-5
Respond	Response Planning (RS.RP) Communications (RS.CO) Analysis (RS.AN) Mitigation (RS.MI) Improvements (RS.IM)	RS.RP-1 RS.CO-1 to RS.CO-5 RS.AN-1 to RS.AN-4 RS.MI-1 to RS.MI-3 RS.IM-1 to RS.IM-2
Recover	Recovery Planning (RC.RP) Improvements (RC.IM) Communications (RC.CO)	RC.RP-1 RC.IM-1 to RC.IM-2 RC.CO-1 to RC.CO-2

Framework Tiers

Weak Controls

Tier 1: Partial

- Ad hoc risk management
- Limited cybersecurity risk awareness
- Low external participation

Tier 2: Risk Informed

- Some risk management practices
- Increased awareness, no program
- Informal external participation

Tier 3: Repeatable

- Formalized risk management
- Organization-wide program
- Receives external partner info

Strong Controls

Tier 4: Adaptive

- Adaptive risk management practice
- Cultural, risk-informed program
- Actively shares information

Framework Profile

C

Current Profile

Current state of alignment between core elements and organizational requirements, risk tolerance, & resources

Where am I today relative to the Framework?

Program Roadmap

T

Target Profile

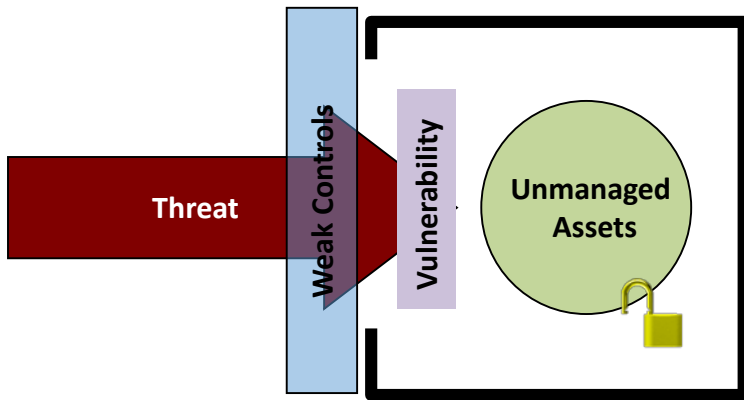
Desired state of alignment between core elements and organizational requirements, risk tolerance, & resources

Where do I aspire to be relative to the Framework?

Building a Risk Model

The Problem:

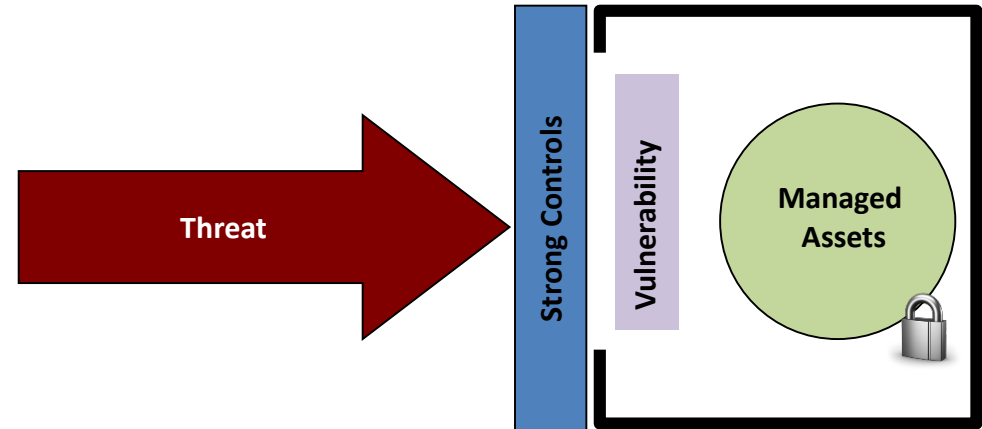
- Unmanaged Assets have weak security controls



Our Unmanaged Assets are at Risk

The Solution:

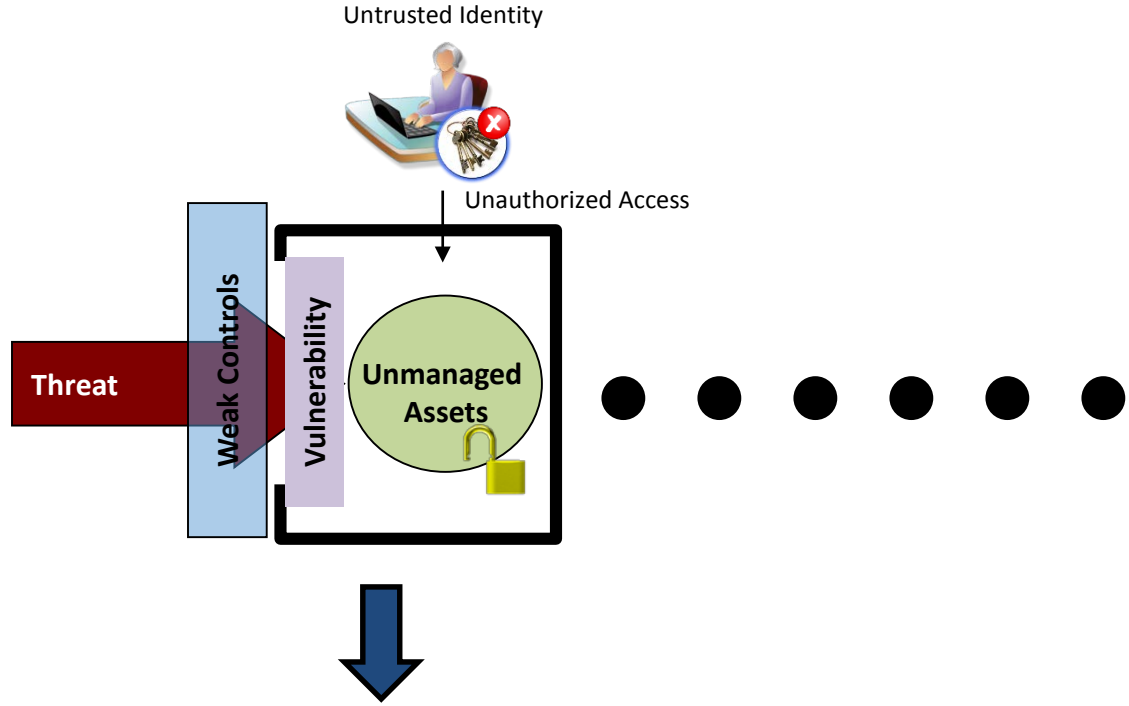
- Managed Assets have strong security controls



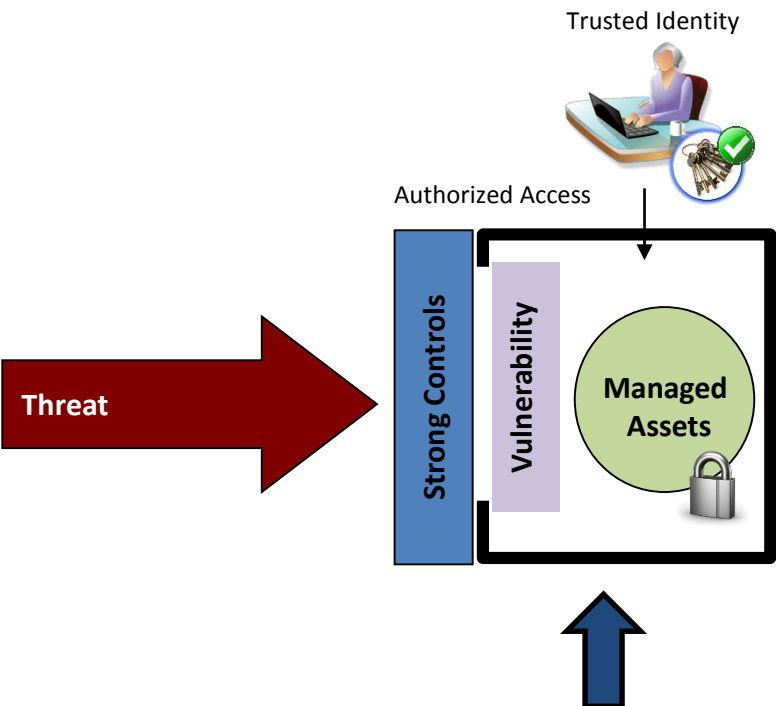
Our Managed Assets are Secure

How do we Manage Risk?

The Unsecure State: Unmanaged Assets & Untrusted Identities



The Secure State: Managed Assets & Trusted Identities



The Engineering Center

- Threat and Vulnerability Area
- Asset and Identity Area
- Controls Framework Area

The Technology Center

- Controls Design and Build Area
- Security Operations Center Area
- Testing and Assurance Area

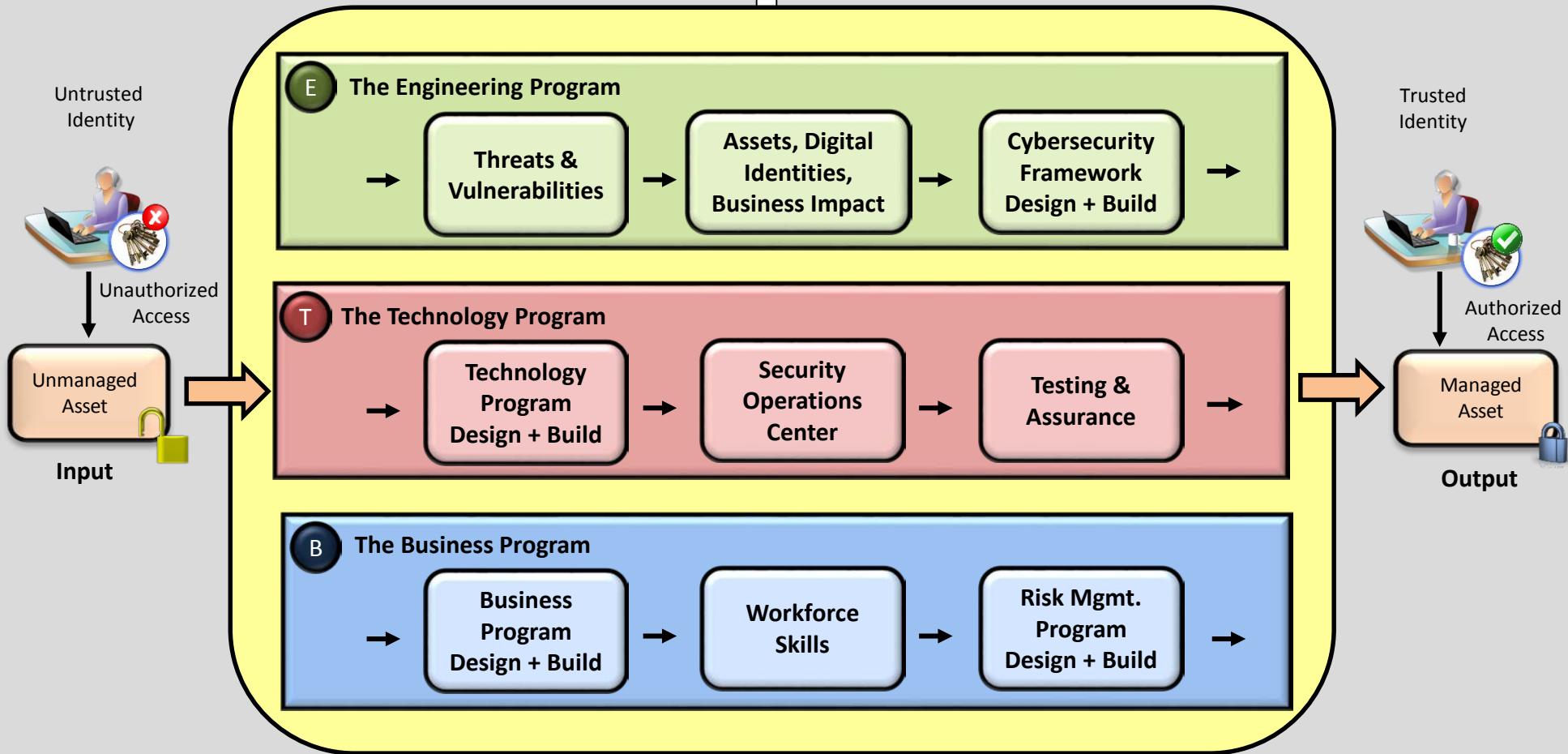
The Business Center

- Controls Design and Build Area
- Workforce Development Area
- Cyber Risk Program Area

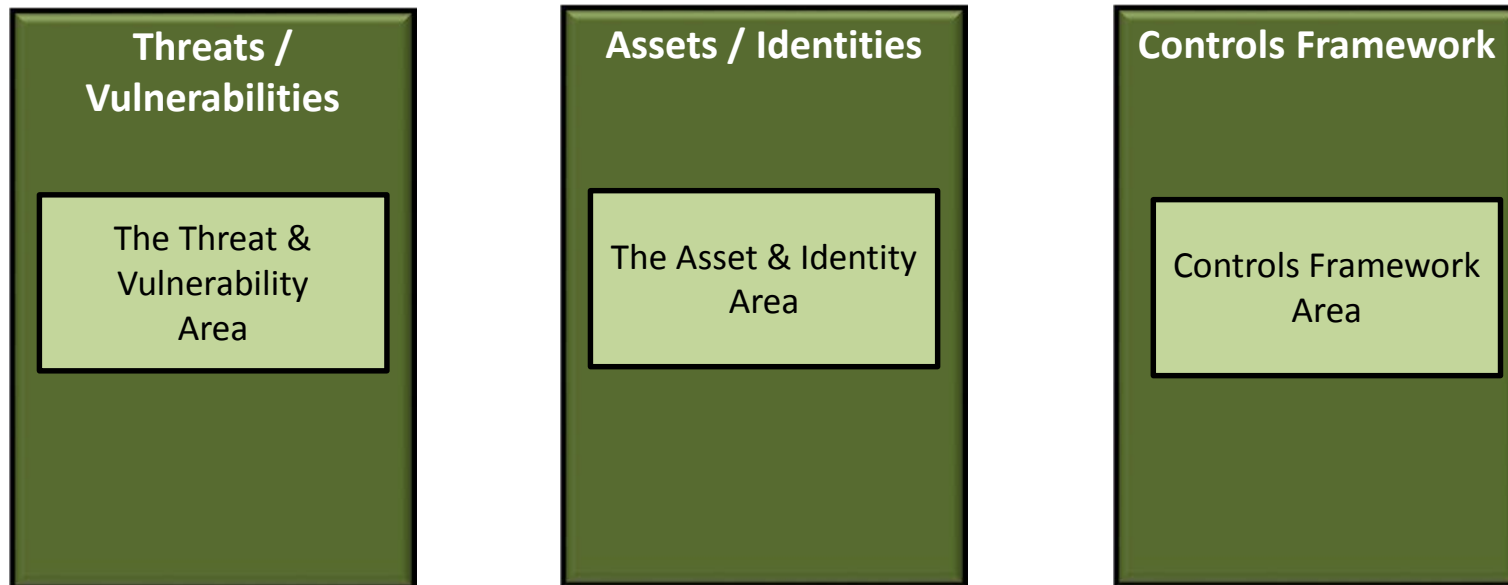
The Controls Factory Model

*The Current Profile
(Before the Factory)*

*The Target Profile
(After the Factory)*



The Engineering Program



The Cyber Threat Landscape

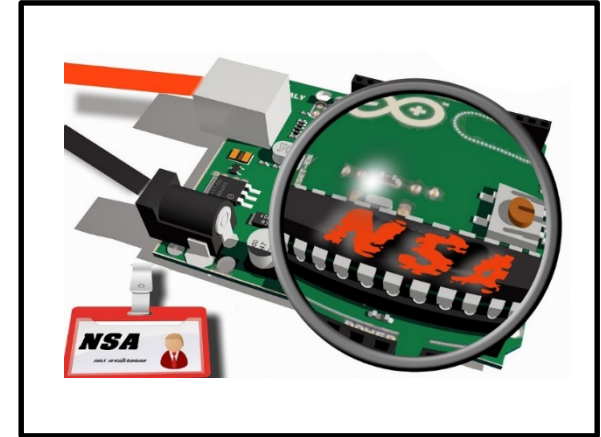
Distributed Denial of Service Attack



Insider Threat



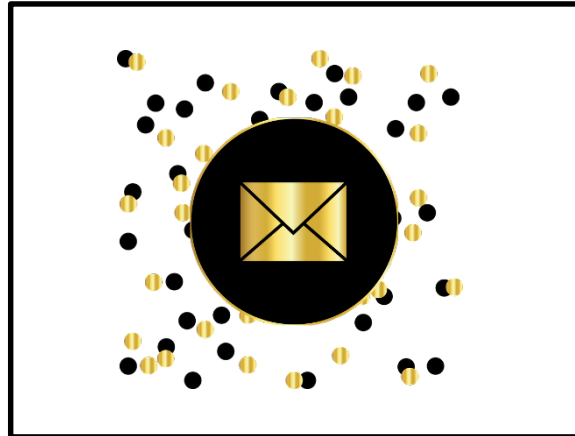
Cyber Espionage



Malicious Software



Phishing Email



Web Based Attack



The Vulnerabilities & Exposures

Ineffective Cybersecurity Program



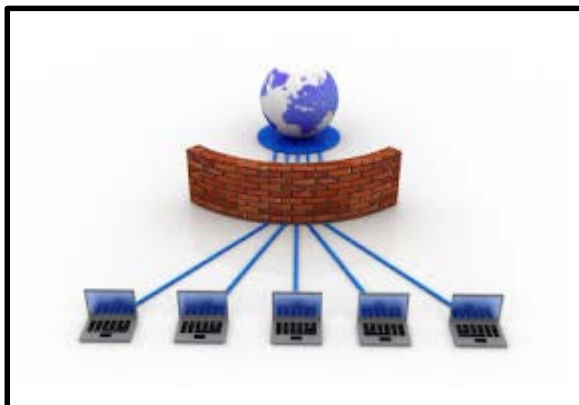
Weak Risk Management Program



Security Policy Deficiencies



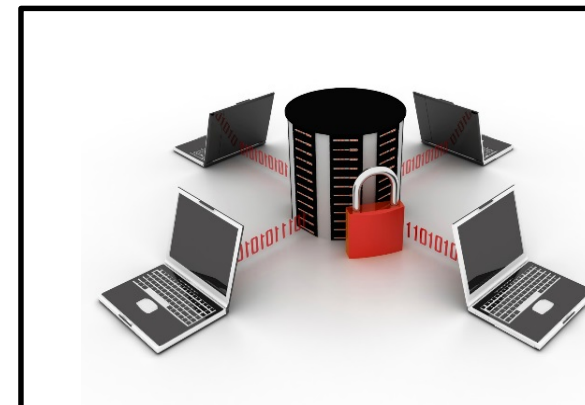
Misconfigured Firewalls



Application Vulnerabilities

```
0111001011100111101011
1000110010101001010101
1010110110101011011011
11101011HACKED11110110
0001010100100001011111
1001010101010101010100
1111100111111011001000
```

Inadequate Logging & Monitoring



The Known & Managed Assets

Endpoint Family

Owner = Desktop Manager



Network Family

Owner = Network Manager



Applications

Owner = Application Manager



Servers

Owner = Systems Manager



Databases

Owner = Database Manager



Information / Data

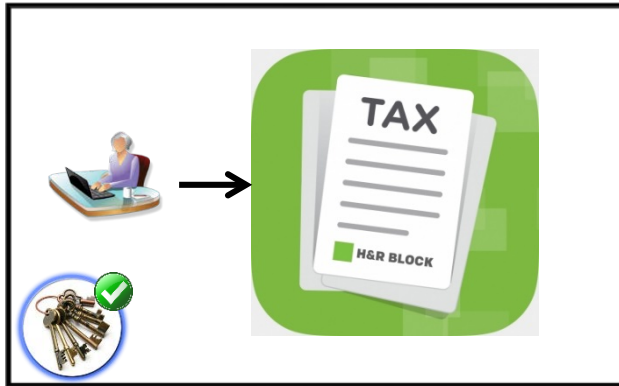
Owner = Business Process Manager



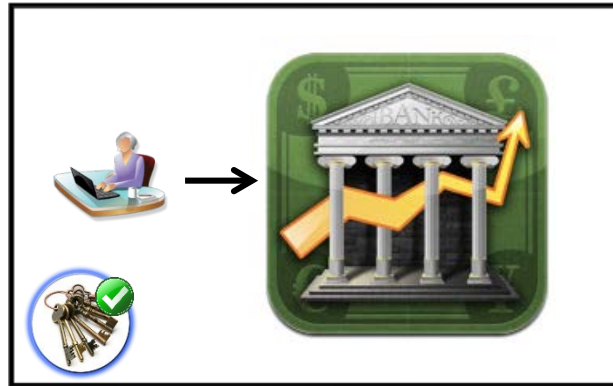
The Known & Trusted Identities

Business Roles

Payroll Analyst



Finance Analyst

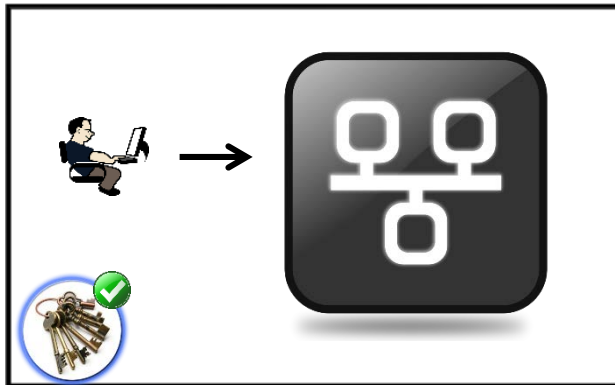


Fund Account Analyst

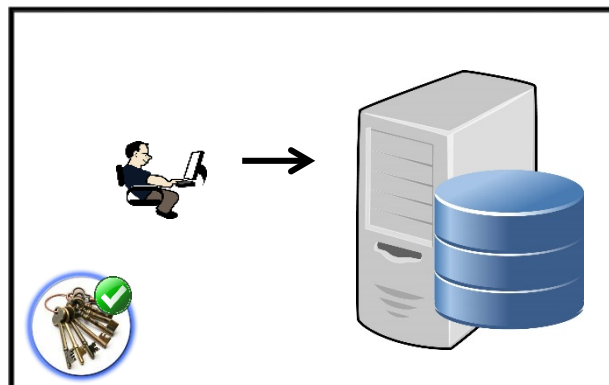


Technical Roles

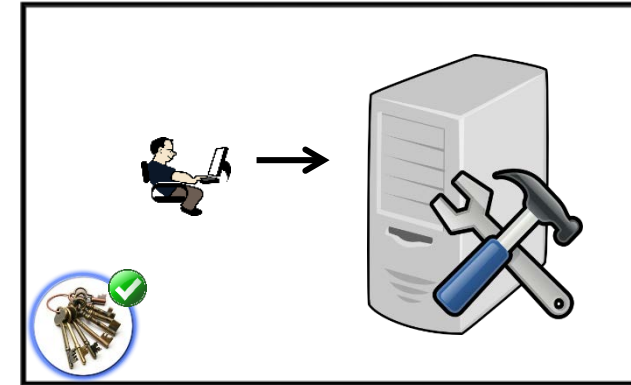
Network Administrator



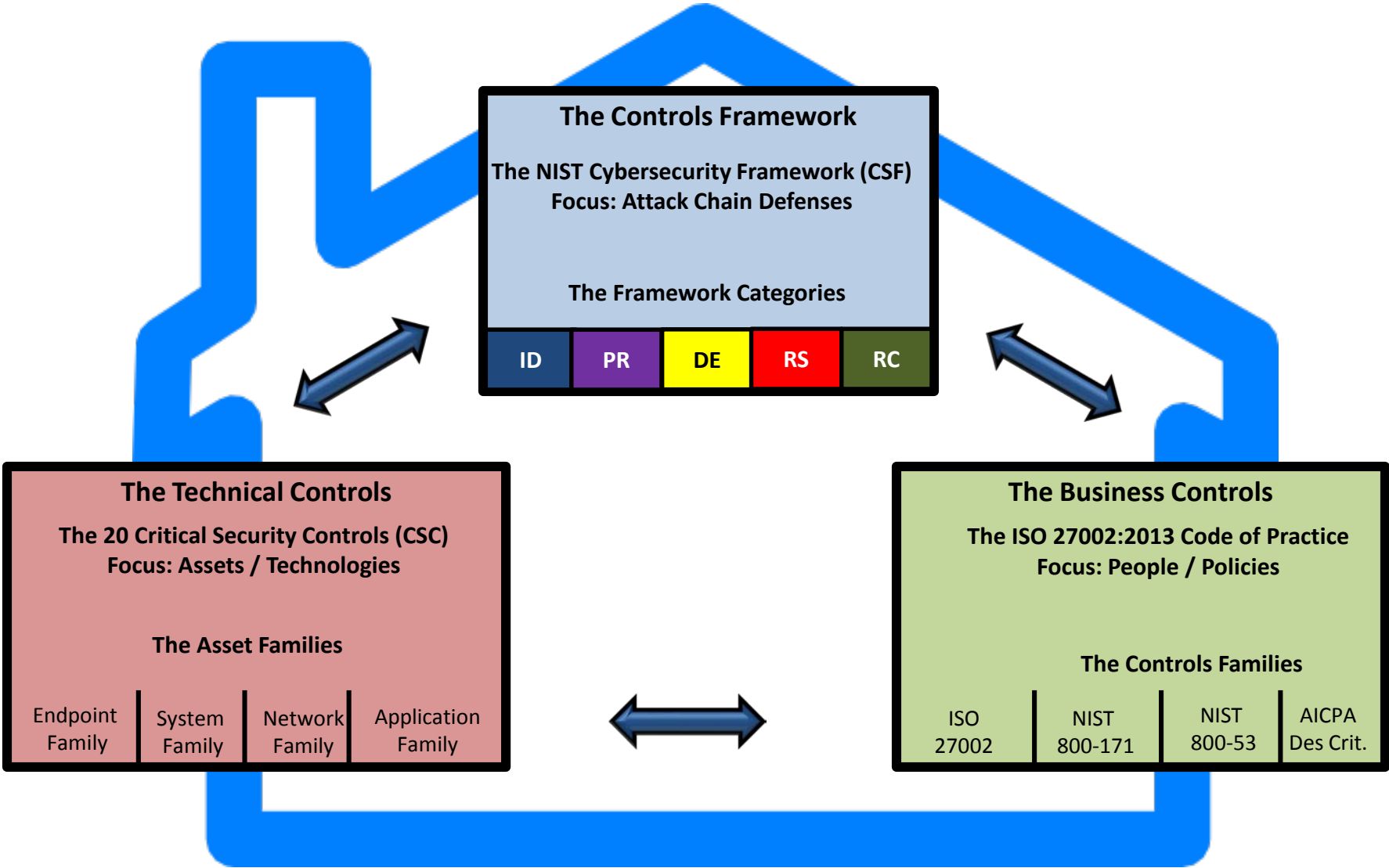
Database Administrator



Systems Administrator



Building a House of Controls



NIST Cybersecurity Framework: Mapping Controls

Core Functions	Categories	Technical Controls	Business Controls
Identify	Asset Management	20 Critical Security Controls	ISO 27002 Code of Practice
	Business Environment	Not Applicable	ISO 27002 Code of Practice
	Governance	Not Applicable	ISO 27002 Code of Practice
	Risk Assessment	20 Critical Security Controls	ISO 27002 Code of Practice
	Risk Management	Not Applicable	Not Applicable
Protect	Access Control	20 Critical Security Controls	ISO 27002 Code of Practice
	Awareness and Training	20 Critical Security Controls	ISO 27002 Code of Practice
	Data Security	20 Critical Security Controls	ISO 27002 Code of Practice
	Information Protection Process	20 Critical Security Controls	ISO 27002 Code of Practice
	Maintenance	20 Critical Security Controls	ISO 27002 Code of Practice
	Protective Technology	20 Critical Security Controls	ISO 27002 Code of Practice
Detect	Anomalies and Events	20 Critical Security Controls	ISO 27002 Code of Practice
	Continuous Monitoring	20 Critical Security Controls	ISO 27002 Code of Practice
	Detection Processes	20 Critical Security Controls	ISO 27002 Code of Practice
Respond	Response Planning	20 Critical Security Controls	ISO 27002 Code of Practice
	Communications	Not Applicable	ISO 27002 Code of Practice
	Analysis	20 Critical Security Controls	ISO 27002 Code of Practice
	Mitigation	20 Critical Security Controls	ISO 27002 Code of Practice
	Improvements	20 Critical Security Controls	ISO 27002 Code of Practice
Recover	Recovery Planning	20 Critical Security Controls	ISO 27002 Code of Practice
	Improvements	20 Critical Security Controls	Not Applicable
	Communications	20 Critical Security Controls	Not Applicable



B

Before the Attack

D

During the Attack

A

After the Attack

Technical Controls Mapping

Mapping Critical Security Controls to NIST Cybersecurity Framework (The Technical Controls)

CIS Critical Security Control	B	B	D	A	A
	Identify	Protect	Detect	Respond	Recover
CSC-01: Inventory of Authorized and Unauthorized Devices	ID.AM	PR.DS			
CSC-02: Inventory of Authorized and Unauthorized Software	ID.AM	PR.DS			
CSC-03: Secure configuration of laptops, workstations, servers		PR.IP			
CSC-04: Continuous Vulnerability Assessment and Remediation	ID.RA	PR.IP	DE.CM	RS.MI	
CSC-05: Controlled Use of Administrative Privileges		PR.AC			
CSC-06: Maintenance, Monitoring and Analysis of Audit Logs		PR.PT	DE.AE	RS.AN	
CSC-07: Email and Web Browser Protections		PR.PT			
CSC-08: Malware Defenses		PR.PT	DE.CM		
CSC-09: Limitation and Control of Ports, Protocols, and Services		PR.IP			
CSC-10: Data Recovery Capability					RC.RP
CSC-11: Secure Configuration of Network Devices		PR.IP	DE.AE		
CSC-12: Boundary Defense		PR.AC	DE.AE		
CSC-13: Data Protection		PR.DS			
CSC-14: Controlled Access Based on Need to Know		PR.AC			
CSC-15: Wireless Access Control		PR.AC			
CSC-16: Account Monitoring and Control		PR.AC	DE.CM		
CSC-17: Security Skills Assessment and Appropriate Training		PR.AT			
CSC-18: Application Software Security		PR.IP			
CSC-19: Incident Response and Management			DE.AE	RS.RP	RC.CO
CSC-20: Penetration Tests and Red Team Exercises	ID.RA			RS.IM	RC.IM

Business Controls Mapping

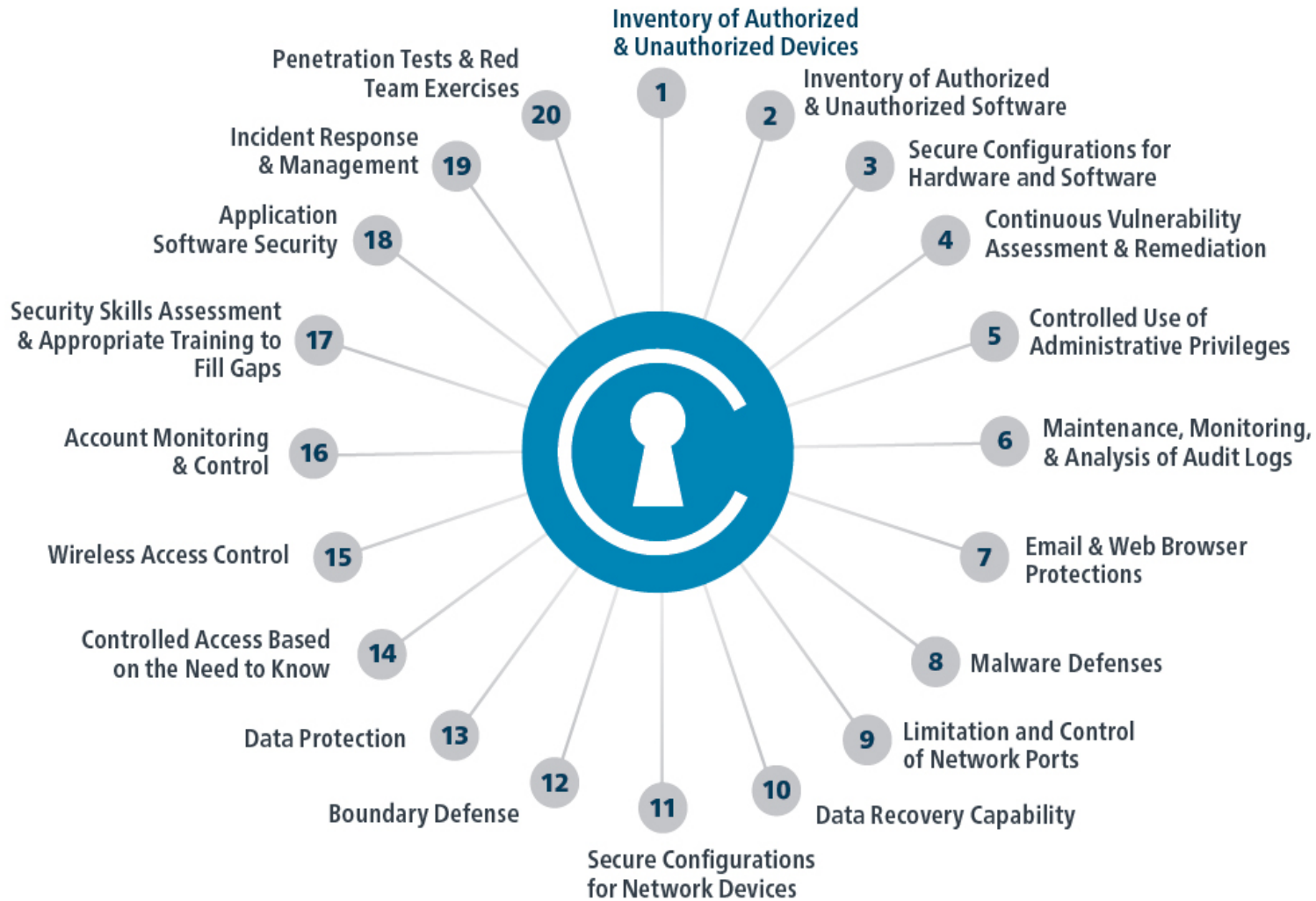
Mapping ISO 27002 Controls to NIST Cybersecurity Framework (The Business Controls)

	B	B	D	A	A
ISO 27002 Control	Identify	Protect	Detect	Respond	Recover
ISO-A5: Information Security Policies	ID.GV				
ISO-A6: Organization of Information Security	ID.AM	PR.AC	DE.DP	RS.CO	
ISO-A7: Human Resources Security	ID.GV	PR.AT			
ISO-A8: Asset Management	ID.AM	PR.DS			
ISO-A9: Access Control		PR.PT			
ISO-A10: Cryptography		PR.AC			
ISO-A11: Physical and Environmental Security	ID.BE	PR.DS			
ISO-A12: Operations Security	ID.RA	PR.PT	DE.CM	RS.AN	
ISO-A13: Communications Security	ID.AM	PR.DS			
ISO-A14: System Acquisition, Development and Maintenance		PR.DS	DE.DP		
ISO-A15: Supplier Relationships	ID.BE	PR.MA	DE.CM		
ISO-A16: Information Security Incident Management		PR.IP	DE.AE	RS.RP	RC.RP
ISPO-A17: Information Security Aspects of Business Continuity Management	ID.BE	PR.IP			
ISO-A18: Compliance with Internal and External Requirements	ID.GV	PR.IP	DE.DP		

The Technology Program



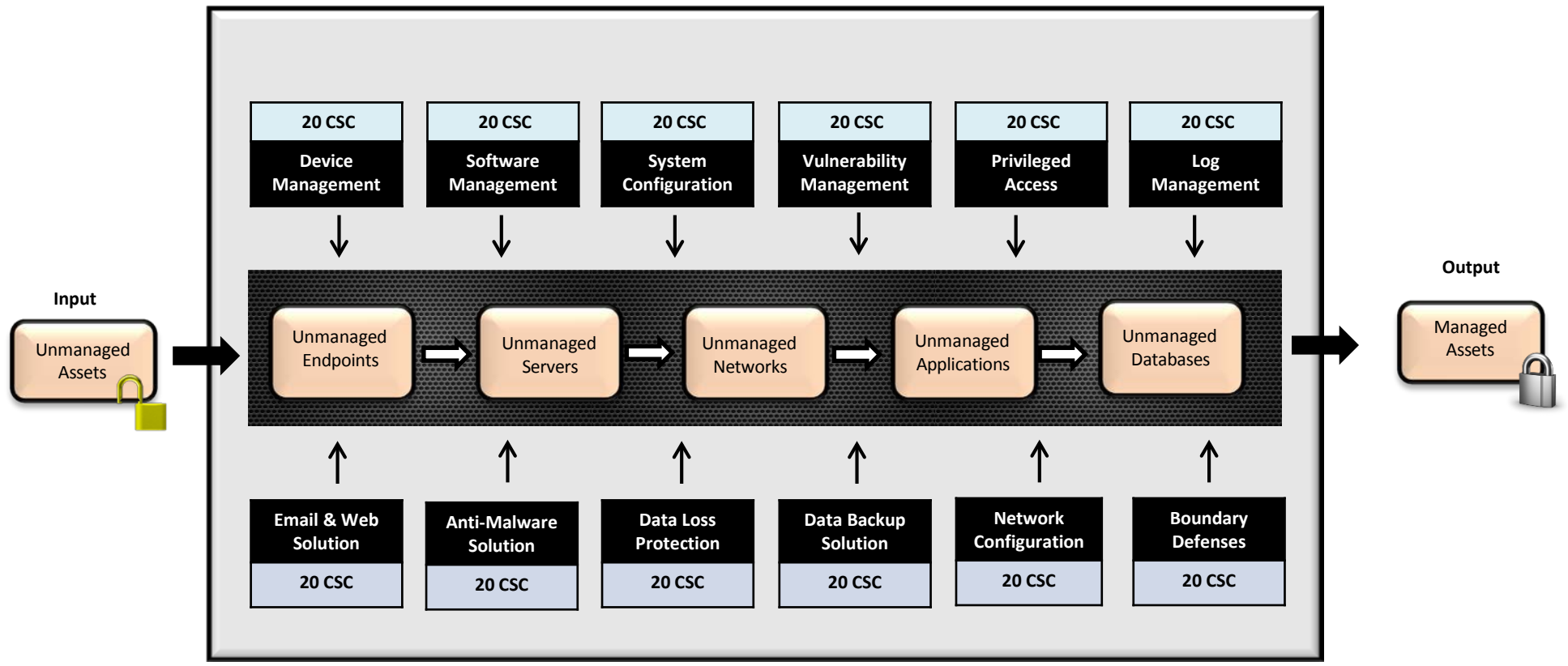
The Technology System: The 20 Critical Security Controls



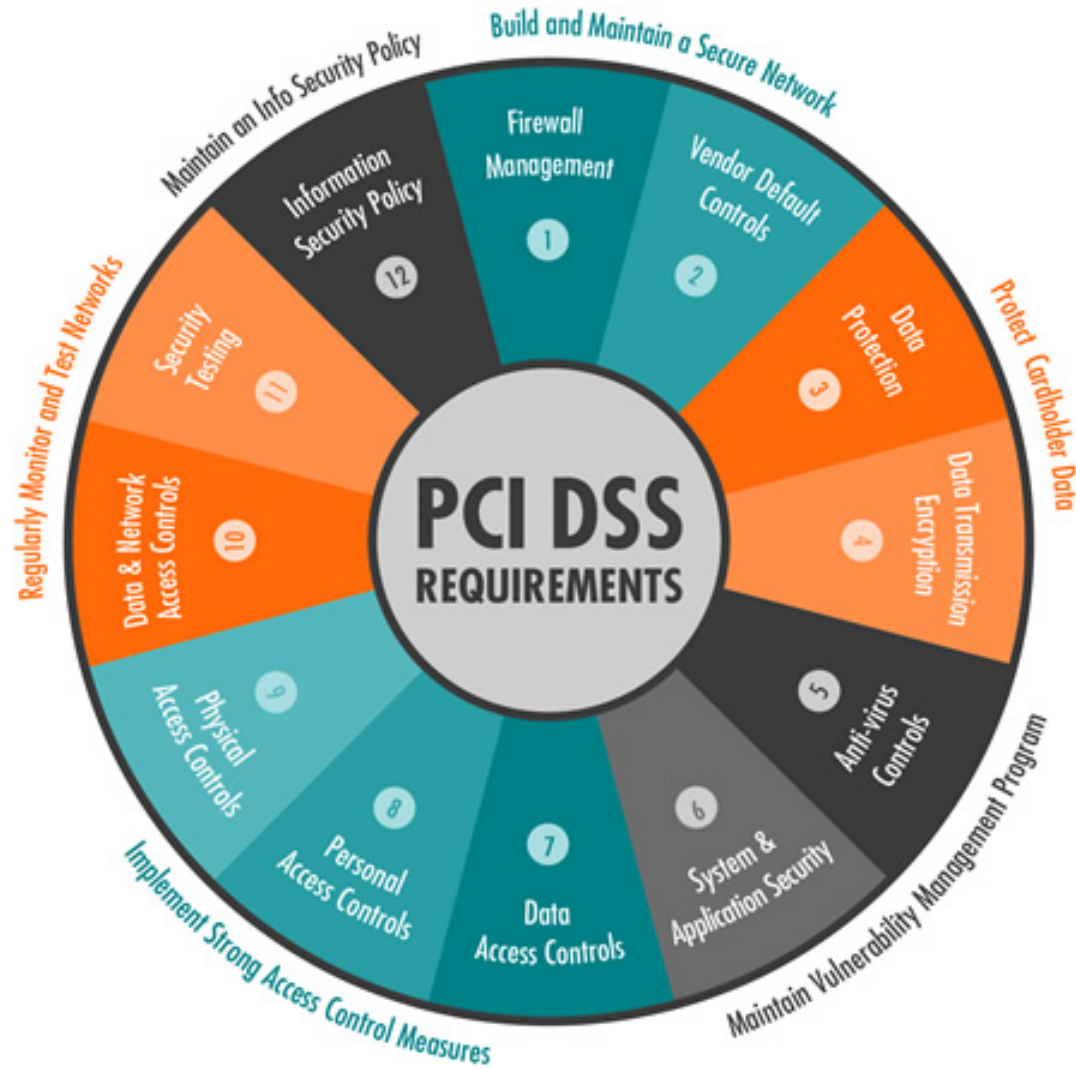
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Applying the Technical Controls

Cybersecurity Technology Solutions and Managed Services



Technology Testing & Assurance



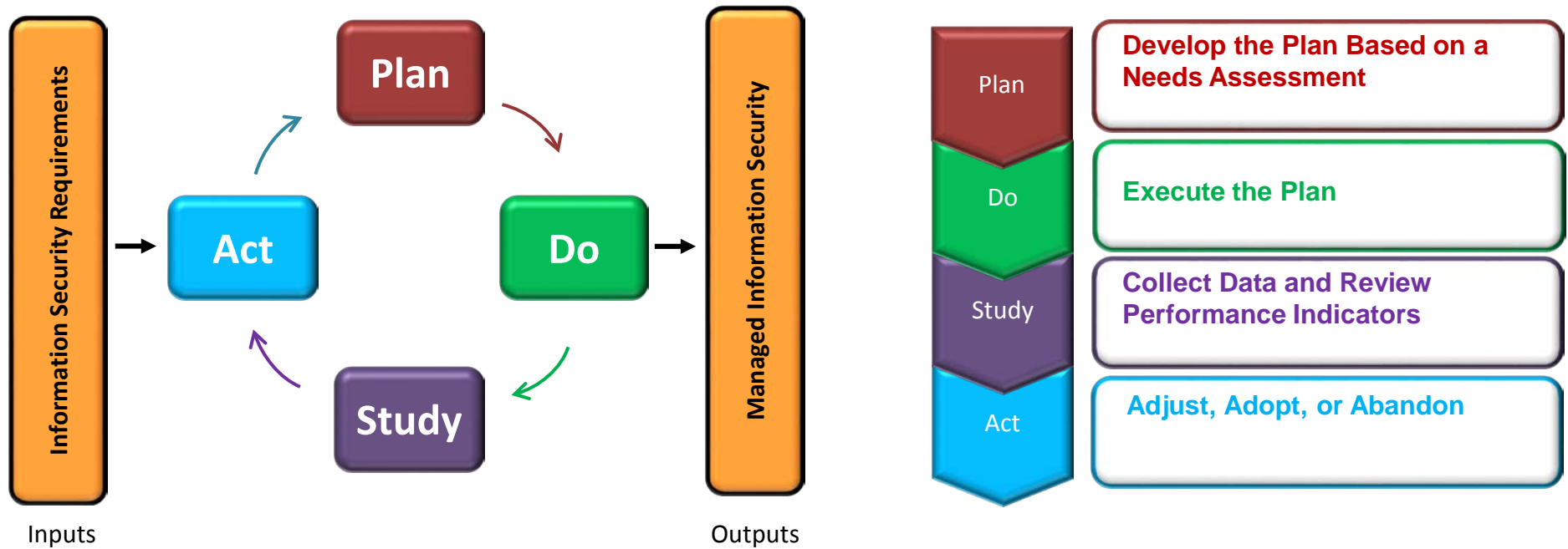
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The Business Program



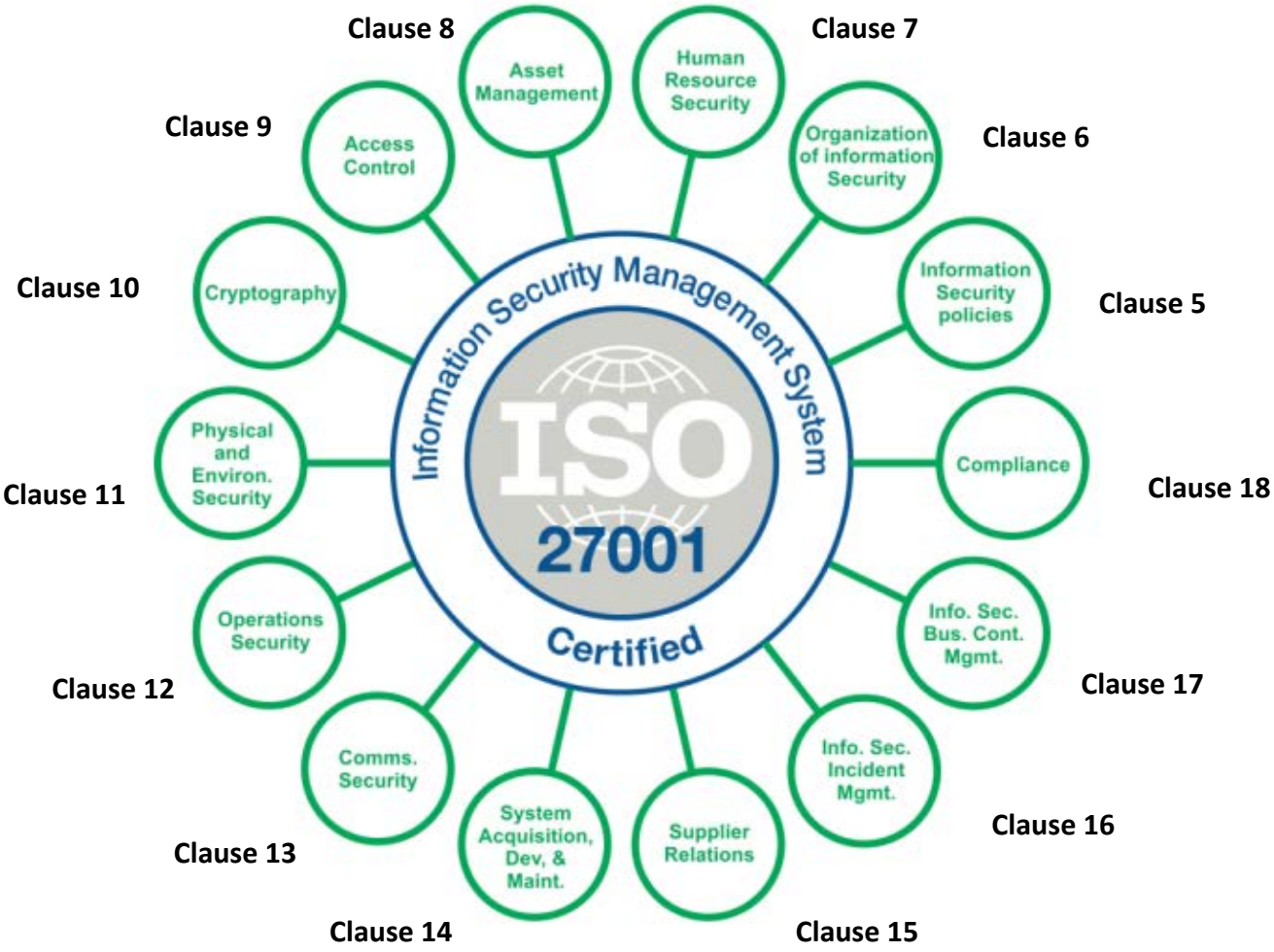
The Business System: ISO 27001

Information Security Management System (ISMS)



The Business Controls: ISO 27002:2013

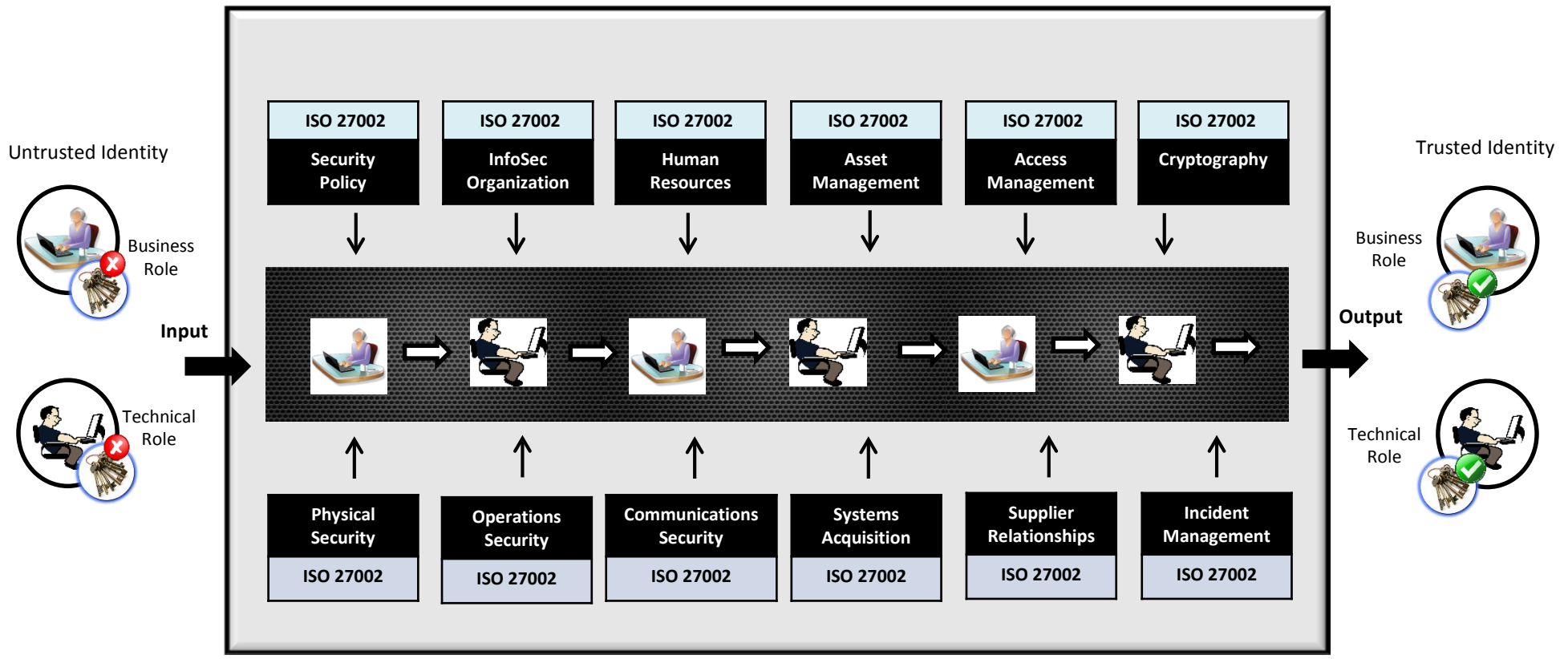
ISO 27001 SECURITY CONTROL DOMAINS ISO/IEC 27001:2013



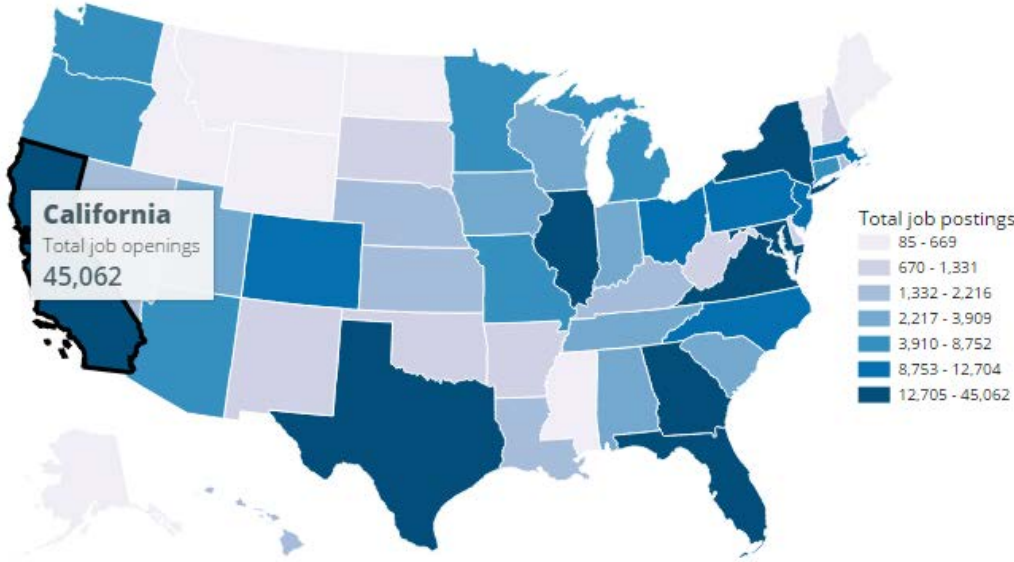
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Applying the Business Controls

Cybersecurity Business Solutions and Skilled Workforce



Cybersecurity Supply/Demand Heat Map



Pennsylvania Job Postings

Cybersecurity Job Openings : 8,874
Employed Cybersecurity Workforce: 23,897

Postings by NCWF Category:

- Securely Provision (SP): 4,332
- Operate and Maintain (OM): 6,096
- Oversee and Govern (OG): 2,572
- Protect and Defend (PR): 2,904
- Analyze (AN): 3,462
- Collect and Operate (CO): 1,334
- Investigate (IN): 575

Certification Holders

- Security+: 4,165
- CIPP: 159
- CISSP: 2,059
- CISA: 1,196
- CISM: 314

Cybersecurity talent gaps exist across the country. Closing these gaps requires detailed knowledge of the cybersecurity workforce in your region. This interactive heat map provides a granular snapshot of demand and supply data for cybersecurity jobs at the state and metro area levels, and can be used to grasp the challenges and opportunities facing your local cybersecurity workforce.

The NICE Workforce Framework

No.	Workforce Categories	Workforce Category Descriptions
1	Securely Provision (SP)	Conceptualizes, designs, and builds secure information technology (IT) systems, with responsibility for aspects of systems and/or networks development.
2	Operate and Maintain (OM)	Provides the support, administration, and maintenance necessary to ensure effective and efficient information technology (IT) system performance and security.
3	Oversee and Govern (OV)	Provides leadership, management, direction, or development and advocacy so the organization may effectively conduct cybersecurity work.
4	Protect and Defend (PR)	Identifies, analyzes, and mitigates threats to internal information technology (IT) systems and/or networks.
5	Analyze (AN)	Performs highly specialized review and evaluation of incoming cybersecurity information to determine its usefulness for intelligence.
6	Collect and Operate (CO)	Provides specialized denial and deception operations and collection of cybersecurity information that may be used to develop intelligence.
7	Investigate (IN)	Investigates cybersecurity events or crimes related to information technology (IT) systems, networks, and digital evidence.

The National Cybersecurity Workforce Framework provides a blueprint to categorize, organize, and describe cybersecurity work into Specialty Areas, tasks, and knowledge, skills, and abilities (KSAs). The Workforce Framework provides a common language to speak about cyber roles and jobs and helps define personal requirements in cybersecurity. The Workforce Framework organizes cybersecurity into seven high-level Categories, each comprised of several Specialty Areas.

AICPA Cybersecurity Risk Management Program (DRAFT)



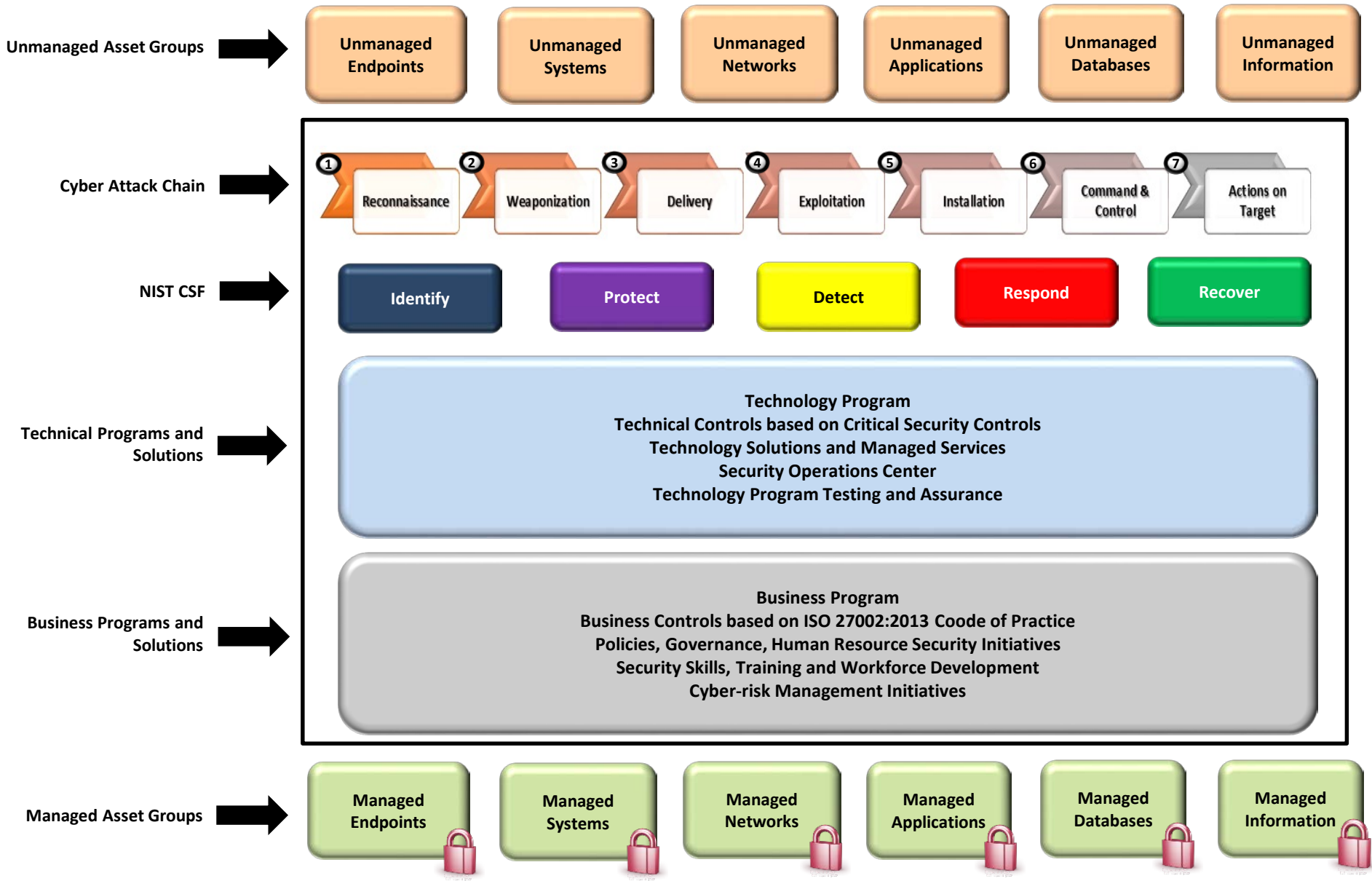
The American Institute of CPAs (AICPA) is working to develop a voluntary, market-based solution to evaluating cybersecurity risk management that could enhance public trust in the effectiveness of a company's cybersecurity programs.

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AICPA Cybersecurity Risk Management Program (DRAFT)

- The AICPA is developing a common foundation to assess the effectiveness of an entity's cybersecurity risk management program.
- The primary objective is to propose a reporting framework through which organizations can communicate useful information regarding their cybersecurity risk management programs to stakeholders.
- The development of a common set of criteria will pave the way for the introduction of a new engagement to assist boards of directors, senior management, and other pertinent stakeholders as they evaluate the effectiveness of an entity's cybersecurity risk management program.
- The existence of multiple, disparate frameworks and programs for evaluating security programs and their effectiveness, as well as different stakeholders' preferences for each, has created a chaotic environment that only increases the burden on organizations trying to communicate how they design, implement and maintain an effective cybersecurity risk management program.
- The AICPA's cybersecurity engagement will be a consistent, market-driven approach to examine and report on an entity's cybersecurity measures that addresses the information needs of a broad range of users.

Lesson 2: The Controls Factory Model



Questions?

