



CASE STUDY

Wright Patman Congressional Federal Credit Union Tightens Information Security with Xacta

Situation

In serving members of the United States Congress and employees of the US House of Representatives, the Wright Patman Congressional Federal Credit Union (WPCFCU) uses Internet technology such as the worldwide web and email to provide its members with convenient services such as home banking, bill paying, and account management.

The Internet is a double-edged sword, however, exposing credit unions to cyber security and cyber liability challenges. Security is crucial for the WPCFCU, given its high profile membership. WPCFCU must also comply with an evolving regulatory requirement created by legislation such as the Gramm-Leach-Bliley Act and National Credit Union Association (NCUA) ecommerce guidelines for maintaining information security.

To address these issues, the WPCFCU has implemented Xacta Commerce Trust™, an enterprise security software application that is enabling the credit union to establish an automated, standards-based, comprehensive and, ongoing approach to information security risk assessment and management.

Objectives

WPCFCU management had several major objectives with regard to security risk assessment and remediation including:

- Thoroughly assessing the current situation,
- Carefully addressing any immediate concerns,
- Complying—and, in fact, exceeding compliance—

with NCUA rule 748 requirements for security assessment,

- Immediately empowering its own users to take ownership of information security, and
- Vigilantly tuning and evolving its security systems as needed on a continuous basis.

Approach

The risk management profile at the WPCFCU was systematically examined by completing a series of specific tasks.

Vulnerability identification.

- Data was collected regarding the security requirements of the systems that comprise the WPCFCU enterprise.
- A vulnerability assessment was performed on the system hardware and software, as well as procedural, physical, personnel, and emissions security.
- Testing was performed to evaluate the impact of computer, network, or software security breaches.

Risk evaluation. The assessment not only highlighted and prioritized system deficiencies, but also provided specific recommendations and cost estimates associated with mitigating each area of risk via such actions as:

- Re-configuring the operating system,
- Changing networking parameters,
- Implementing a new password system,
- Modifying certain applications, and
- Applying system patches.

"Xacta Commerce Trust gives me the level of information I need as a CEO to insure our compliance with information security standards and guidelines. And it certainly makes all of us aware of areas of potential vulnerability."

Robert Hess
CEO, Wright Patman Congressional
Federal Credit Union

Project management. Xacta worked closely with information technology personnel from WPCFCU throughout the implementation of Xacta Commerce Trust to:

- Eliminate vulnerabilities
- Map plans for responding to attacks
- Share best practices from Xacta's extensive risk management experience, and
- Conduct rigorous training of WPCFCU staff so that they can continue the risk management program in the future.

Results

- Some minor security risks were identified, and corrective action taken immediately to ensure there is no compromise to the integrity of WPCFCU information systems.
- Compliance to regulations and standards was evaluated. The Xacta Commerce Trust knowledgebase contains the ISO 17799 international standard for information security management, as well as the NCUA examiner's questions (EC-1 and EC-2). The software automatically generates reports to document WPCFCU's risk posture in accordance with these

requirements. The NCUA examiners, pleased to see such a proactive and well-documented approach, passed WPCFCU with flying colors.

- WPCFCU now has confidence in its ability to continuously monitor its risk profile against emerging vulnerabilities and to implement procedures to mitigate future risks, because the system is "always on."

Future Plans

- Having completed an initial risk assessment effort, WPCFCU now has a system in place that can be used to check for additions, changes, and deviation from the defined measurement standard on an ongoing and consistent basis.
- Instead of merely having a "snapshot" or point in time security assessment, the credit union has incorporated enterprise risk management processes into their day-to-day business practices.
- The "multi-tiered reporting" provided by Xacta Commerce Trust provides security information appropriate to every level in the WPCFCU organization, supporting their philosophy that from now on, "security is everyone's job."

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