

From: [Randy Odenbaugh](#)
To: [PRAINFO](#)
Subject: FFIEC Cybersecurity Assessment Tool. Request for Comment
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Hello and thank you for the opportunity to comment on the FFIEC Cyber Security Assessment Tool.

Before my comments, allow me the opportunity to thank the FFIEC for this wonderful product. This tool will be very beneficial to attaining our cybersecurity goals because it gives us not only an existing benchmark of our current structure, the Maturity Matrix give us concrete goals to attain.

My first comment is in regards to the Maturity Matrix. While I appreciate the notion of keeping it simple, there are far too many “declarative statements” in each domain / Maturity Level, yet I agree that they need to be there.

For example, if an organization only can answer two of the four statements in the affirmative, how would they answer the Yes/No question and how would that affect the overall ranking of the Domain ?

Without over complicating the matrix, might I suggest all Declarative Statements for a single domain/maturity level be grouped together, each one be answered with a Yes/No and then the group be tallied.

If this concept was carried out matrix wide, the % of yes/no answers could determine the maturity level. The outcome would be the same “below baseline” but tracking and rectifying / mitigating the NO’s would be easier.

Furthermore, above baseline, there would / could be more levels of maturity.

Lastly, it would be of great help if the FFIEC would rank each Declarative Statement on importance. This would give organizations clearer goals.

My second comment has to deal with the concept that this self-assessment tool will be completely voluntary. How will/does the FFIEC and other governing bodies plan to enforce this idea ?

Our examiners / auditors will be asking for this report. A tool of this magnitude is an examiners / auditors dream. If organizations answer each question fully and honestly, in an examiners / auditors hands, it would be a road map for critique. We could not say “NO” when asked to produce it, you do not say “NO” to your examiners / auditors.

The message boards are already afire over this topic.

Thank you again for this wonderful tool.

May I leave you with one thought.

The old saying still rings true: Ignorance is Bliss.

The new saying: “Knowledge is culpability” should be our battle cry for this cyber war.

Keep spreading the Knowledge.

Thank you..

Randal J. Odenbaugh
VP of I.T.
Prince Georges Community
Federal Credit Union
301.627.2666 Ext 1028
FAX: 240-556-1141
Rodenaugh@princegeorgescfcu.org

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