



# MEASURING TECHNOLOGY SUCCESS CONNECTING RISK, GOVERNANCE, AND METRICS

RSM - WINTRUST

APRIL 9, 2018



# AGENDA

- Today's business leaders are required to effectively oversee IT and Cyber Security — increasing value and performance while decreasing risk. Board's role is to provide oversight over those areas and help drive better risk management. Learn how to use industry standard frameworks to better inform your leaders and the board.
  
- By the end of this course, you will be able to:
  - Leveraging enterprise risk management and industry leading IT / IS frameworks to evaluate and direct enterprise IT
  - Transforming IT metrics into risk dashboards to report and inform Executives and the Board
  - Case Study: How Wintrust linked their ERM program to the FFIEC CAT framework to measure success

# INTRODUCTIONS



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## AT A GLANCE

**WINTRUST**



Financial services holding company providing community banking, wealth management, commercial insurance premium financing, and mortgage origination

**\$18+** billion in assets

**15** wholly owned banking subsidiaries

**RSM**



Fifth largest audit, tax and consulting firm in the US and the largest firm world-wide focused on serving the middle market

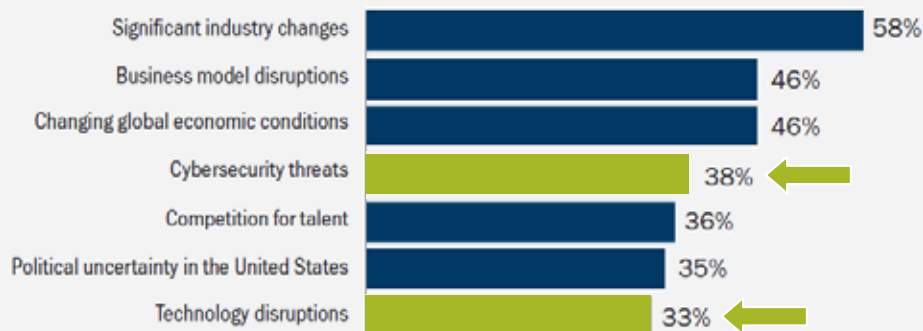
**120+** countries

**41,000+** people

## WHAT DO PUBLIC COMPANY BOARDS BELIEVE THE TOP BUSINESS TRENDS WILL BE IN 2018?

### What Five Trends Do You Foresee Having the Greatest Effect on Your Company Over the Next 12 Months?

(Respondents could select five of the 17 issues below.)

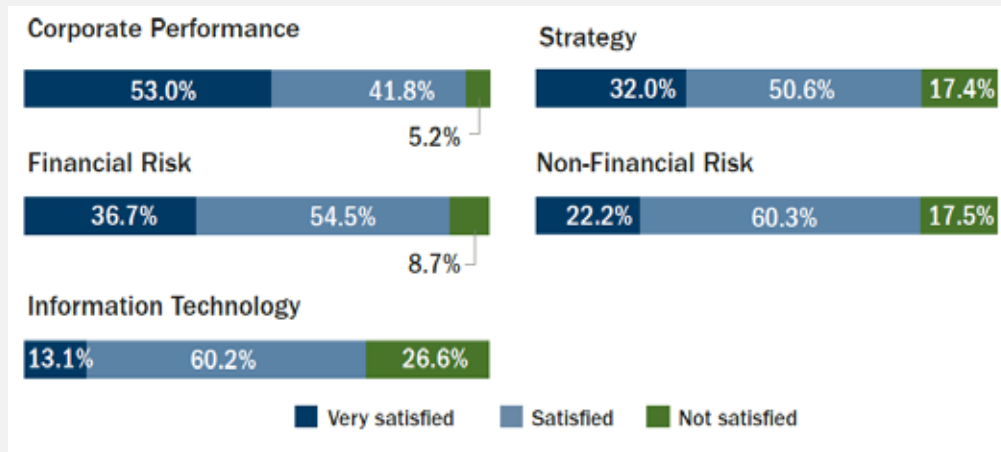


Source: 2017-2018 NACD Public Company Governance Survey.

- **Cybersecurity Risk Becoming a Boardroom Staple**
- Concern has risen with widely reported breaches
- Increasing need for clearer and more complete, relevant, and timely assurance regarding the organization's ability to identify, manage, and respond to cyber risks

## BOARD MEMBERS ARE NOT SATISFIED WITH THE INFORMATION PROVIDED BY IT

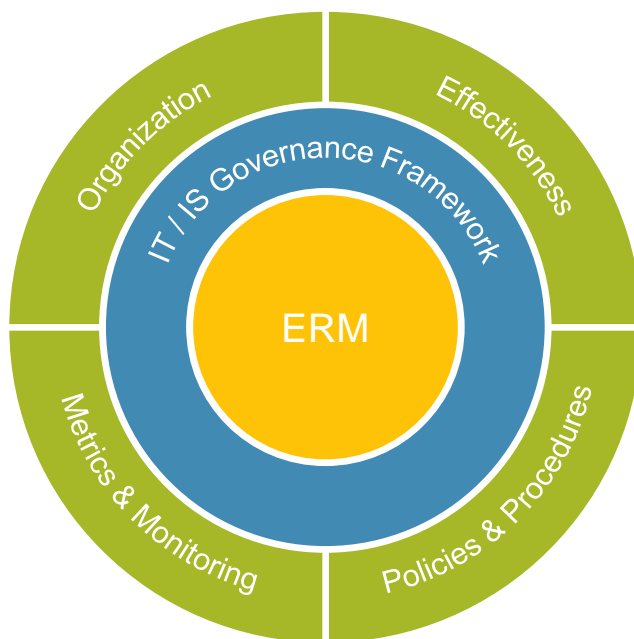
Please assess the quality of the following information provided to the board by management:



- Information is either too much or too granular and without prioritization
- More likely to become overwhelmed and miss critical risks
- Often times, Board composition does not include IT expertise
- Only **49 percent** of board respondents are confident or very confident that management can effectively manage cyber risk

Source: NACD Mitigating Board Information Risk

## HOW DO ORGANIZATIONS IMPROVE THE INFORMATION AND DATA PROVIDED TO THE BOARD AND EXECUTIVE MANAGEMENT?

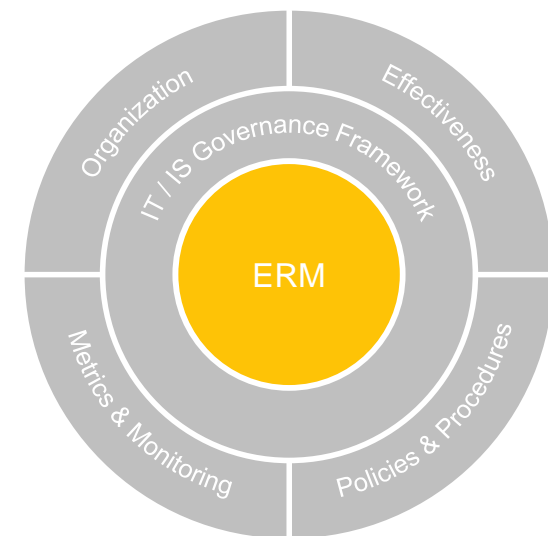


- Align IT / IS risk governance to organization's Enterprise Risk Management processes
- Enables IT / IS to measure risks as part of organizational reporting and review structure
- Enables policy/procedure development and department structure alignment with ERM



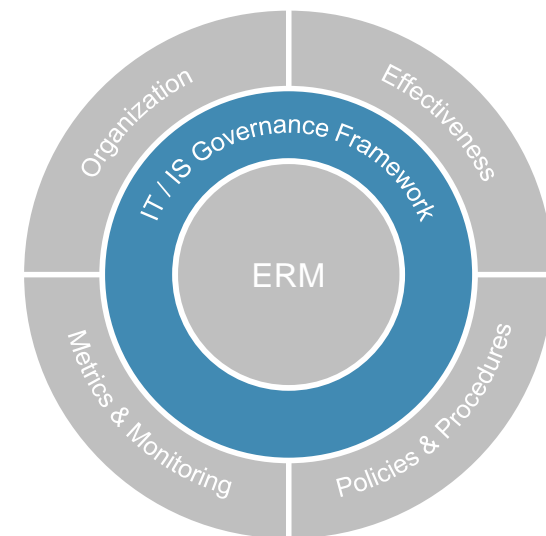
# BEGIN WITH ENTERPRISE RISK MANAGEMENT MODEL

- Enterprise Risk Management (ERM) provides the Board and Executive leadership visibility into risks across the organization and their impact on objectives
  - Provides opportunity to **identify** emerging risks
  - Provides opportunity to **prioritize** response
  - Provides opportunity to **track** mitigation effectiveness
  
- Measures and represents the health of the company
- ERM model is specific to company profile
- Risk appetite is established and incorporated into operations



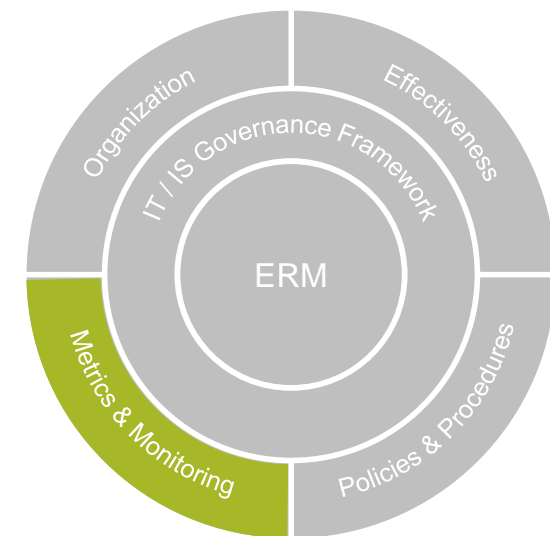
# CHOOSE THE RIGHT GOVERNANCE FRAMEWORK

- IT/IS governance is a framework to ensure that IT/IS investment and output are supporting organizational objectives and goals
- Utilize the framework to establish gaps, risks and priorities
- Governance framework is specific to the needs of the organization
  - Industry
  - Regulatory
  - Size
  - Structure
  - Focus
  - Maturity



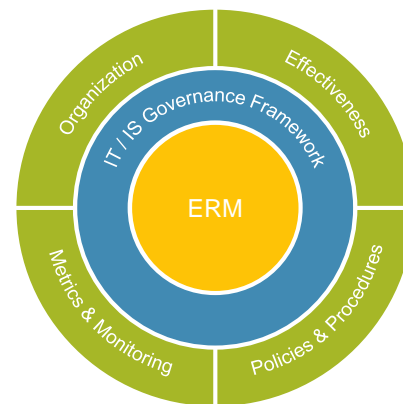
## MEASURE AGAINST THE FRAMEWORK

- Performance vs Risk Indicators
  - KPIs measure the **actions** that lead to a result – **Operational**
  - KRIs measures the **results** from your actions – **Strategic**
  
- Begin with most critical risks
  - Many governance frameworks include recommended KPIs and KRIs
  - Non-compliance to regulatory requirements and/or policy
  - Start with the data you have - generate, iterate and automate
  
- Metric thresholds should align with organizational risk appetite



## Enterprise Risk Management

- Board and Executive visibility into organizational risks
- IT/IS adopts ERM framework processes



### IT / IS Governance Framework

- Select a framework for fit and purpose
- Aligns IT risk governance to organizational priorities

### Organization

- Framework informs structure and job descriptions
- Leverage framework to identify gaps

### Metrics & Monitoring

- Concisely inform the Board of critical risk areas
- Start with highest risk KPIs/KRIs that can be produced today

### Effectiveness

- Framework provides the basis for improving maturity
- Focus improvements on critical risk areas

### Policies & Procedures

- Framework informs policy and procedure content
- Describe the “what” and “how” to deliver on the framework

# CASE STUDY

HOW WINTRUST LINKED THEIR ERM PROGRAM TO THE FFIEC CAT FRAMEWORK TO MEASURE SUCCESS

# WINTRUST COBIT ASSESSMENT AND ROADMAP

The COBIT governance framework was selected to be used in an initial assessment of Wintrust's IT organization

1. Weighted each COBIT process relative to size and industry
2. Assessed IT governance relative to the COBIT framework
3. Evaluated and documented gaps for each process
4. Created roadmap to address the identified gaps



## Assessment

- All **policies & procedures**
- Existing **organization** structure
- **Monitoring** and metrics (KPI/KRI)
- Process control **effectiveness**



## Analysis

- Detailed observations and recommendations for each COBIT process

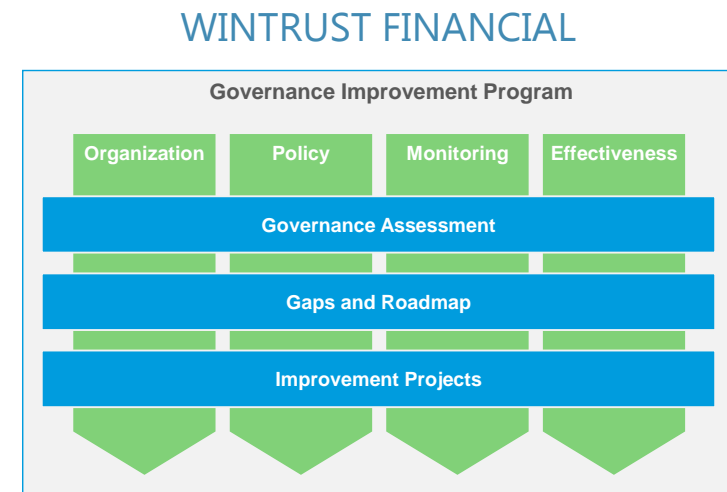


## Roadmap

- Developed a prioritized and phased roadmap focused on monitoring and effectiveness

## GOAL: DEVELOP AN EFFICIENT MONITORING AND RISK REPORTING PROCESS TO CONCISELY INFORM BOARD MEMBERS

- 1 **Incorporate InfoSec into ERM** framework and reporting process
- 2 **Raise risk awareness** at all levels of the organization
- 3 Report only **prioritized KRIs** to the board to reduce volume and detail of information
- 4 Create **dashboard view** of board packet to focus on high risk KRIs



## CHALLENGES

1

### ERM NOT EFFECTIVELY APPLIED TO IT / IS

- ERM framework existed for broader organization
- Improvement needed for identifying and reporting critical risks



2

### NO IT / IS GOVERNANCE FRAMEWORK IN PLACE

- IT department was focused on operational risk
- InfoSec was recently carved out from IT



3

### METRICS FOCUSED ON TACTICAL IT PERFORMANCE

- Limited data sources were available
- Little time to show marked improvement



## RESPONSES

- Developed traceability from operational IT / IS metrics up to ERM framework
- Obtained Committee and Board Level approvals for governance methodology

- Leveraged the FFIEC Cybersecurity Assessment Tool (CAT) results and framework as a baseline
- Built a matrix of policy requirements for metrics

- Identified 15 initial KRIs to align with the ERM model including thresholds and target audience
- Outlined a metrics roadmap of future KRIs to publish in-line with the program's maturity plan



# FFIEC CYBERSECURITY ASSESSMENT TOOL (CAT)

- Wintrust completed a risk assessment using the FFIEC CAT to identify which domains and assessment factors carried the most risk
  - Leveraged CAT to establish risk profile
  - Conducted a maturity assessment
  - Metrics were developed to address high risk domains and factors

FFIEC Cybersecurity Assessment Tool	
Domain	Assessment Factors
<b>1 Cyber Risk Management &amp; Oversight</b>	<ul style="list-style-type: none"> <li>• Governance</li> <li>• Risk Management</li> <li>• Resources</li> <li>• Training and Culture</li> </ul>
<b>2 Threat Intelligence &amp; Collaboration</b>	<ul style="list-style-type: none"> <li>• Intelligence Sourcing</li> <li>• Monitoring and Analyzing</li> <li>• Information Sharing</li> </ul>
<b>3 Cybersecurity Controls</b>	<ul style="list-style-type: none"> <li>• Preventative Controls</li> <li>• Detective Controls</li> <li>• Corrective Controls</li> </ul>
<b>4 External Dependency Management</b>	<ul style="list-style-type: none"> <li>• Connections</li> <li>• Relationships Management</li> </ul>
<b>5 Cyber Incident Management &amp; Resilience</b>	<ul style="list-style-type: none"> <li>• Incident Resilience Planning and Strategy</li> <li>• Detection, Response and Mitigation</li> <li>• Escalation and Reporting</li> </ul>

		Inherent Risk Levels				
		Least	Minimal	Moderate	Significant	Most
Cybersecurity Maturity Level for Each Domain	Innovative					
	Advanced					
	Intermediate					
	Evolving					
	Baseline					

Source: FFIEC cybersecurity assessment tool user guide

# DEVELOPED KRI SET BASED ON CAT ASSESSMENT

Multiple views created depending on audience

KRI Tiers
Tier 1: Board Level KRIs
Tier 2: IT/IS Committee Level KRIs
Tier 3: CISO / Management Level KRIs

Presentation format was adopted from the ERM model

Thresholds were established to align with risk appetite

Risk trending built into the presentation

Metrics were organized by CAT domain

Future metrics roadmap created with

Cyber Risk Management & Oversight
Failure Rate % of Mock Phishing Campaign
YTD % of Security Awareness Training Not Completed on Time
% of Clean Desk Failures / Areas Audited

	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
<b>Cyber Risk Management &amp; Oversight</b>	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
% of Security Awareness Training Completed on Time	> 90%	≥ 89% < 75%	< 75%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
Failure Rate % of Mock Phishing Campaign	< 10%	>10% < 15%	>15%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	DECREASING
<b>Threat Intelligence &amp; Collaboration</b>	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
Financial Services (FS-ISAC) Cyber Threat Level	≤ 1	≥ 2	≥ 3	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
Infocon SANS Storm Center Threat Level	≤ 1	≥ 2	≥ 3	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
<b>Cybersecurity Controls</b>	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
% of Quarterly Access Control Reviews Complete	> 90%	≥ 89% < 75%	< 75%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	INCREASING
% of Level 1 Applications with Provisioning Standards Documented	100%	≥90%	<90%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	INCREASING
Risk Score of Patches Not Applied >90 Days	tbd	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	DECREASING
Risk Score of Patches Not Applied >60 Days	tbd	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
Risk Score of Unsupported Systems	0	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
Risk Score of Unsupported Applications (Future KRI)	0	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
% of Open Security Code Findings (Future KRI)	tbd	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
<b>Third Party Security Management</b>	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
% of Third Party Reviews Completed	> 90%	≥ 89% < 75%	< 75%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	INCREASING
# of Third Party Control Requirements Open > 30 days	<2	>2 <5	≥5	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
<b>Cyber Incident Management and Resilience</b>	Risk Appetite			Jul-17	Jun-17	May-17	Apr-17	Mar-17	Feb-17	Jan-17	Dec-16	Nov-16	Oct-16	Sep-16	Aug-16	KRI TREND
# of Open vs Closed Incidents	tbd	tbd	tbd	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE
% of Devices Impacted by Malware	≤ 1%	>1% <3%	≥3%	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	STABLE

# QUESTIONS AND ANSWERS?

END OF PRESENTATION

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# THANK YOU FOR YOUR TIME AND ATTENTION!

IIA CHAPTER CHICAGO | 58<sup>TH</sup> ANNUAL SEMINAR

