

GLBA Compliance Assessment
Detailed Report – Sample

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Requirement #1:

A Written Information Security Program

Requirement Description:

An “Information Security Program” means the administrative, technical, or physical safeguards used by a financial institution to protect the access, collection, distribution, processes, protection, storage, use, transmission, disposal of, or otherwise handling of customer information.

Control Type: Governance

Control Objective:

a) Review, Approval, And Authorization	b) Planning And Controlling	X
c) Safeguarding And Monitoring	d) Training And Development	
e) Analysis And Calculation	f) Verification And Quality Control	
g) Processing And Information Exchange	h) Reliability And Information Integrity	
i) Segregation Of Duties	j) Regulatory Compliance	X

Analysis and Observations:

In discussions with ABC College management, it has been determined by the iSecure GLBA assessment team, that ABC College does not currently have a written Information Security Program that meets the GLBA compliance requirements as stipulated in 16 CFR §§ 314.3 (a) & (b) - Interagency Guidelines and standards for Safeguarding Customer Information. This finding was re-affirmed in the mid-level control compliance matrix that was completed by IT management.

Conclusions:

Not Adequate – the control environment does not meet the minimum requirements to be materially compliant with FTC regulations as provided for in 16 CFR §§ 314.1 -314.5 - Interagency Guidelines and standards for Safeguarding Customer Information.

Remediation:

The ABC College Leadership team must insure that the designated employee(s) which are charged with the development and implementation of the Information Security Program, develop and implement a comprehensive Information Security Program that includes administrative, technical, or physical safeguards to protect the access, collection, distribution, processes, protection, storage, use, transmission, disposal of, or otherwise handling of customer information. A key

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to the implementation of an Information Security Program is that the scope of the program covers information that is maintained in paper, electronic, or other form, which is handled or maintained by ABC staff or by third party business partners.