

## Summary

HCB (Hometown Community Bank), a (fictional) small financial institution, has completed a targeted mapping of 18 key CIS Controls Safeguards to the NIST Cybersecurity Framework 2.0 and its internal control catalog. This mapping supports GLBA compliance, PCI-DSS requirements, and a practical, risk-based security program tailored to the limited resources of a small bank.

The mapping is predominantly full strength, with one partial mapping (secure configuration baselines). Most controls are rated high priority and serve as foundational inputs for HCB's annual risk assessment.

## Prioritized Controls & Risk Content

The table below summarizes the mapped controls, their HCB names, NIST CSF 2.0 references, and suggested priority based on risk-assessment impact.

| #          | CIS ID | CIS Safeguard Title                            | HCB Control ID & Name                         | NIST CSF 2.0                   | Mapping Strength | Suggested Priority | Key Risk Application                          |
|------------|--------|--|---|--------------------------------|------------------|--------------------|---|
| 1.1 / 1.2  |        | Enterprise Asset Inventory                     | HCB-ID-001 Asset Inventory                    | ID.AM-01,02,05                 | Full             | High               | Foundational for ALL controls                 |
| 2.1        |        | Vulnerability Management + Automated Scans     | HCB-PR-003 Patch & Vulnerability Mgmt         | ID.RA-01,02 / PR.VM-01/02      | Full             | High               | Prioritize remediation by risk score          |
| 3.1        |        | Data Management Process                        | HCB-PR-004 + HCB-GLBA-001 Data Classification | PR.DS-01,02,05                 | Full             | High               | GLBA-mandated risk-based classification       |
| 5.1 / 5.3  |        | Accounts Inventory + Disable Dormant           | HCB-PR-001 Access Control & Account Inventory | PR.AC-01,04,07                 | Full             | High               | Risk-based privileged & dormant focus         |
| 6.1        |        | Secure Configuration Process                   | HCB-PR-002 Secure Configuration Mgmt          | PR.PS-01,02                    | Partial          | High               | Reduce misconfiguration risk (baseline first) |
| 8.1        |        | Enforce Multi-Factor Authentication            | HCB-PR-001 MFA & Authentication Policy        | PR.AC-01,06,07                 | Full             | High               | Apply to high-risk (privileged/remote) access |
| 9.1        |        | Ensure Use of DMARC / Email Protections        | HCB-PR-007 Email Security & Anti-Phishing     | PR.PS-01 / PR.AT-01            | Full             | Medium             | Phishing risk reduction                       |
| 10.1       |        | Deploy & Maintain Anti-Malware                 | HCB-PR-006 Endpoint Protection                | PR.PS-01 / DE.CM-04            | Full             | Medium-High        | Standard endpoint baseline                    |
| 11.1       |        | Data Recovery Process + Automated Backups      | HCB-RC-002 Backup & Data Recovery Mgmt        | RC.RP-01,02 / PR.DS-04         | Full             | High               | Ransomware / data-loss mitigation             |
| 13.1       |        | Collect Audit Logs + Deploy SIEM               | HCB-DE-001 Security Monitoring & SIEM         | DE.CM-01,02,07                 | Full             | High               | Risk-based log collection & alerting          |
| 14.1       |        | Security Awareness Training                    | HCB-PR-005 Security Awareness Training        | GV.OC-03 / PR.AT-01,02         | Full             | Medium             | Targeted training based on user risk          |
| 15.1       |        | Vendor Management + Third-Party Risk           | HCB-GOV-003 Third-Party / Vendor Risk Mgmt    | GV.OC-02 / ID.RA-05 / PR.IP-01 | Full             | High               | Dedicated vendor risk assessments required    |
| 16.1       |        | Incident Response Plan                         | HCB-RS-001 Incident Response Plan             | RS.RP-01,02 / RS.CO-01         | Full             | High               | Risk-based scenarios & playbooks              |
| 17.1       |        | Encrypt Data on End-User Devices               | HCB-PR-004 Encryption & DLP                   | PR.DS-01,02                    | Full             | High               | Risk-based encryption decisions               |
| 18.1       |        | Automated Pen Testing + Red Team               | HCB-PCI-001 Penetration Testing & Red Team    | ID.RA-03 / PR.VM-03 / RS.MA-01 | Full             | High               | Scope & frequency driven by risk assessment   |
| (Specific) |        | Information Security Program & Risk Assessment | HCB-GOV-001 InfoSec Program & Risk Assessme   | GV.OC-04 / GV.RM-03            | Full/Direct      | Critical           | This IS the risk assessment control           |

## Next Steps

Some steps that HCB should take from here.

- Complete the enterprise asset inventory (HCB-ID-001) by Q2 2026.
- Conduct the first formal risk assessment using HCB-GOV-001 to validate and refine priorities.
- Develop a 12-month implementation roadmap with assigned owners and budget.

## Conclusion

HCB's security controls mapping provides a clear, standards-based roadmap that is both compliant and practical for a small bank. HCB is well-positioned to protect customer data, reduce cyber risk, and demonstrate strong governance.