



## AT&T Consulting

### Federal Trade Commission security program assessment

#### Overview

Data breaches of personal customer information have caused legislation to be enacted to better protect customer personal information. For example, the Federal Trade Commission (FTC) has begun requiring comprehensive security assessments of merchants, providers, and other organizations which have become subject to legal process at the FTC to ensure they take “reasonable care” in securing consumer data. Generally, the resultant FTC consent order requires firms to engage independent third party assessors to perform security assessments. The assessments typically must be performed on an initial and biennial basis, and then be repeated for an FTC-mandated period of time.

#### Solution

AT&T Consulting has developed an approach to performing FTC required assessments. We use a selection of controls/safeguards grounded in the language of the customer’s FTC consent order, and further informed by International Organization for Standardization 27001 (ISO27001) and 16 Code of Federal Regulations (CFR) 314 (Standards for Safeguarding Customer Information). This collection of relevant controls and standards forms our evaluation baseline.

AT&T Consulting has a team which holds the requisite FTC-required security industry certifications, which enables us to certify our assessment results. This confirms that the customer’s security program operates effectively, providing reasonable assurance that the security, confidentiality and integrity of Personal Information is protected. It further confirms that the program was conforming throughout the evaluation.

#### Approach

AT&T Consulting employs a three-step approach to meeting FTC assessment program objectives. See figure 1 on the following page.

##### 1. Information Gathering

AT&T Consulting begins by reviewing all documentation relevant to the company’s information security program. This includes the policies and practices that support the program. We perform interviews of key program stakeholders in order to understand how policies and procedures are implemented. In addition, AT&T Consulting examines select controls through detailed testing and observation to validate their implementation and effectiveness.

##### 2. Review and Analysis

Using information gathered in step 1, AT&T Consulting compares the organization’s information security program and any identified risks against the requirements of the FTC consent order.

##### 3. Reporting

AT&T Consulting will then produce an FTC Security Program Assessment Report. This provides a certified assessment of the customer’s security program. It specifically covers our opinion as to whether the program provides sufficient protection (confidentiality, integrity and authenticity) of eligible Personal Information. Part of the certification includes a confirmation that the data was correctly protected during the assessment, as normally required by the customer’s FTC consent order.

AT&T Consulting takes a holistic approach to the FTC Security Program Assessment, addressing elements of people, technology, and processes. We combine in-depth knowledge and use of Information Security Standards of Good Practice (SOGP), applicable regulatory requirements and our experience in information security management practices within the industry.

Figure 1: AT&T Consulting FTC Assessment Workflow



**Key Benefits**

- Focused assessment of FTC requirements
- Encompasses elements of ISO27001
- Multi-step process covering discovery, review, analysis and reporting
- Holistic approach combines targeted requirements and industry-standard best practices
- Well equipped and experienced to perform compliance assessments as required in typical FTC consent orders

**AT&T Security Solutions: Expertise from a Trusted Provider**

AT&T provides a unique and world-class portfolio of assessment, compliance and related security services. Our stability, experience and expertise, and commitment to open standards have established us as a strategic and Trusted Advisor with our customers. By leveraging AT&T you can expect best-in-breed solutions, a global network of proven technology, and a cost-effective program-based approach to meet all of your security and compliance needs.

For more information about AT&T Security Consulting contact your AT&T Representative, visit us at [www.att.com/consulting/security](http://www.att.com/consulting/security), call us at 877 954-7771 or email us at [mss@att.com](mailto:mss@att.com).



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