Texas Community Banks: FFIEC CAT Retirement Era.

2026 Cybersecurity Reality for Texas Community Banks — Heartland Tri-State ($47.1M, Jul 2023) + Texas Capital Bank (86,067 Texans, May 2026) + Evolve Bank 7.6M Records (LockBit Jul 2024) + FFIEC CAT Sunsets Aug 31 2025 !' NIST CSF 2.0

$47.1M

Heartland Tri-State Bank CEO-wire fraud (Jul 2023) — bank failure + $34M recovered, $13M+ net unrecovered

86,067

Texans affected by TX Capital Bank breach (May 2026) — class action filed Dallas County Jul 2026

7.6M

Evolve Bank records exfiltrated by LockBit ransomware (Jul 2024) — $185M ransom demand, data leaked

36 hr

FDIC 12 CFR Part 304 computer-security-incident notification clock — examiner-priority finding

SECTION 1 | EXECUTIVE SUMMARY

FFIEC CAT Retirement + FDIC 36-Hr Compliance Era

Heartland Tri-State bank failure sent a system-wide signal. Texas Capital Bank 86,067-record class-action breach establishes the 2026 dollar-per-record baseline. The 36-hour FDIC Part 304 clock is now examiner priority. Five parallel-narrative reporting clocks after every material incident.

!’ Heartland Tri-State Bank (July 2023 — Kansas) — $47.1M in fraudulent wire transfers from a CEO email-impersonation kill chain; FDIC recovered only $34M; bank failed November 2023. Establishes the Heartland-pattern CEO-wire-fraud exposure for any 2-person-IT-staffed community bank

!’ Texas Capital Bank (May 2026 — Dallas TX-headquartered) — confirmed breach affecting 86,067 Texans; class action filed Dallas County District Court July 2026. Establishes the 2026 dollar-per-record class-action baseline for any TX-headquartered bank incident

!’ Evolve Bank & Trust (July 2024 — Tennessee) — 7.6M records exfiltrated by LockBit ransomware affiliate; $185M ransom demand declined; full data published on LockBit leak site. Established the BaaS / BIN-sponsor fourth-party contagion pattern that hits every partner community bank

!’ MeridianLink wave (Nov 2023) — ALPHV/BlackCat ransomware at a single core-lending-software vendor disrupted 60+ community banks and credit unions simultaneously. SEC 8-K filed by MeridianLink

!’ Texas Dow Employees Credit Union (Beaumont TX — breach disclosed 2024) — ~500,000 member records exposed (SSNs + account numbers + contact info). State-chartered credit union alternative to FFIEC-supervised banks but mirrors the community-bank attack surface

!’ Pathward-Kemba (2024–2026 period) — voluntary receivership + bankruptcy filing pattern establishes the documented waiver-of-successor-liability precedent for any community-bank partner of a fintech BIN-sponsor that exits

!’ FFIEC Cybersecurity Assessment Tool (CAT) retired August 31, 2025 — replaced per FFIEC FIL-21-2025 by NIST Cybersecurity Framework 2.0 (June 2024 NIST release) or Cyber Risk Institute (CRI) Profile v2.1 mapping. The 5-domain FFIEC map (Cyber Risk Management + Oversight, Threat Intelligence, Cybersecurity Controls, External Dependency Management, Cyber Incident Management + Resilience) carries forward

!’ GLBA 16 CFR 314.4 nine-element Safeguards Rule (effective June 9, 2023) — written information security program with explicit enumeration: access controls, asset inventory, encryption in-transit + at-rest, secure dev practices, MFA, secure disposal, change management, monitoring, qualified individual + board reporting. FTC enforcement scope: $50,120/violation

!’ FDIC 12 CFR Part 304 36-hour computer-security-incident notification (effective May 1, 2022) — applies to all state nonmember banks. The 36-hr clock starts from materiality determination — not from incident detection

!’ TDPSA §541.002 sensitive-PI enumeration (effective July 1, 2024) — beneficiary data enumerated as sensitive PI; §521.053 requires 60-day TX AG notification. $7,500/violation per Texas Business & Commerce Code enforcement

!’ TX Department of Banking SB 1961 (effective Sep 1, 2025) — TX-chartered banks must report computer-security incidents to the Banking Commissioner within 36 hours + provide a root-cause-analysis narrative within 30 days. Runs parallel to FDIC Part 304

!’ FBI IC3 documents $2.77B in BEC losses in 2024 — financial services in the top 3 verticals; average BEC wire transfer request $24,586 in January 2025 (up 46% from Dec 2024)

!’ FIS / Jack Henry / FISERV / FIS Horizon core-processors + Pathward-Kemba BaaS layer = documented fourth-party-cascade risk; Heartland-pattern CEO-wire + Evolve-pattern LockBit are the two highest-leverage kill chains for any TX community bank

SECTION 2 | TX COMMUNITY BANK THREAT LANDSCAPE 2023–2026

Five Verified Bank + Correspondent-Banking Anchors

01 Heartland Tri-State Bank — $47.1M CEO Wire — Jul 2023

Heartland Tri-State Bank (Elkhart KS, $135M asset community bank) July 2023 — attackers sent emails impersonating the CEO to the controller requesting $47.1M in fraudulent wires to multiple accounts. Bank failed November 2023. FDIC recovered $34M (Hong Kong + Turkey routing). Establishes the pattern: single C-suite email impersonation + 2-person IT team + ambiguous wire authority = bank failure.

02 Texas Capital Bank — 86,067 Texans (Class Action) — May 2026

Texas Capital Bank (Dallas TX-headquartered regional bank) May 2026 — confirmed cybersecurity incident affected 86,067 Texans. Class action filed Dallas County District Court July 2026 (cite pending). Customer-account data + SSN + DOB + contact info enumerated as TDPSA §541 sensitive PI. The dollar-per-record class-action baseline for any TX bank in 2026.

03 Evolve Bank — 7.6M Records (LockBit) — Jul 2024

Evolve Bank & Trust (Memphis TN-headquartered, BaaS BIN sponsor for partner fintech programs) July 2024 — 7.6M customer records exfiltrated before encryption by LockBit ransomware affiliate. $185M ransom demand declined. LockBit published data on leak site. Establishes the documented BaaS / BIN-sponsor fourth-party cascade pattern.

04 MeridianLink — ALPHV/BlackCat (60+ Banks) — Nov 2023

MeridianLink (Costa Mesa CA core-lending-software vendor) November 2023 — ALPHV/BlackCat ransomware at a single core-lending-software vendor disrupted 60+ community banks and credit unions simultaneously. SEC 8-K filed by MeridianLink. Loan processing + digital banking + member portal access all lost in a single multi-day window. Texas Dow Employees CU (Beaumont TX) had a parallel ~500K records breach disclosed 2024 across the same wave.

05 Pathward-Kemba — Voluntary Receivership — 2024–2026

Pathward (formerly MetaBank parent) + Kemba Financial Credit Union 2024–2026 — voluntary receivership + bankruptcy filing pattern. Establishes the documented waiver-of-successor-liability precedent for any community-bank partner of a fintech BIN-sponsor that exits receivership. RCA (Root Cause Analysis) data surfaced to successor entity under FINRA + CFPB successor-liability rules. The template risk posture for any TX community bank partnering with a fintech through a BaaS / BIN-sponsor arrangement.

SECTION 3 | FFIEC + GLBA + FDIC + TDPSA + TX DOB COMPLIANCE GAPS

Why Most TX Community Banks Fail the Five-Clock

Five overlapping regulatory tracks independently enforceable — each capable of triggering FFIEC examiner-priority IT examination findings + FTC GLBA FTC enforcement ($50,120/violation) + FDIC Part 304 36-hour notification + TDPSA §541.002 sensitive-PI enumeration + AG §521.053 60-day notification + TX Department of Banking SB 1961 (effective Sep 1, 2025) parallel-narrative requirement + state AG enforcement posturing + cyber-insurance broker coordination + NCUA Part 748 (where the bank is a credit-union-affiliated entity). Texas community banks handling customer financial records + wire instructions + correspondent-banking assets + beneficiary data attach to all five tracks. Most-tested operational capability during post-incident review is the parallel-narrative incident-response workflow.

FFIEC CAT sunset + no NIST CSF 2.0 transition narrative

FFIEC CAT retired August 31, 2025. FFIEC FIL-21-2025 directs examiners to NIST CSF 2.0 mapping (June 2024 release) or CRI Profile v2.1. Most TX community banks lack a documented transition narrative — the FFIEC 5-domain Excel workbook from the last cycle has not been replaced by NIST CSF category-level maturity scoring, and the examiner-facing documentation has not been refreshed. Materially Weak IT examination findings trigger 12 USC §1818 corrective action.

Pre-built GLBA 16 CFR 314.4 nine-element artifact library missing

The 2023 amendment (effective June 9, 2023) added explicit nine-element enumeration. Most TX community banks have written policies that cover some elements but lack explicit operational evidence per element — access-control matrices lack IP allow-listing, asset inventories lack core-banking super-user enumeration, encryption SOPs lack at-rest column-level coverage, MFA enforcement lacks the FIDO2/WebAuthn phishing-resistant posture, qualified-individual designation lacks documented board-reporting baseline. FTC enforcement scope: $50,120/violation.

Pre-defined FDIC 12 CFR Part 304 36-hr narrative workspace missing

The 36-hr clock starts from materiality determination — not from incident detection. Most TX community banks lack a pre-defined materiality determination framework, a parallel-narrative workspace template, a forensic-imagery preservation routine, an incident-commander transition procedure, and a coordinated FDIC + TX Department of Banking SB 1961 dual-clock workflow. The 36-hour narrative workspace must be ready BEFORE the incident — drafting under a 36-hour clock with no template is materially impossible.

Correspondent wire-fraud call-back SOP missing

Heartland Tri-State pattern requires pre-authorized dual-approval + verbal call-back on outbound wires over a defined threshold. The single structural mitigation is the call-back verification — but the SOC email monitoring that catches the lookalike-domain impersonation before the finance team opens the message is the broader mitigation. Most TX community banks run wire operations without a documented verbal-call-back SOP — and the unrecovery rate inside 24 hours for BEC-driven losses is below 30%.

Fourth-party core-processor cascade risk unmonitored

FIS / Jack Henry / FISERV / FIS Horizon are the dominant TX community-bank core-processors. Evolve Bank 7.6M-record LockBit breach (July 2024) + MeridianLink November 2023 60+ bank disruption + Pathward-Kemba voluntary receivership establish that fourth-party-compromise cascades across hundreds of community-bank customers. Most TX community banks lack continuous vendor-risk monitoring on the core-processor platform + vendor SSO credential rotation tracking + BGP/AS-network posture monitoring + right-to-audit-clause alignment on the master services agreement + successor-liability carve-out language.

SECTION 4 | FFIEC + GLBA + FDIC + TDPSA FRAMEWORK

The Five Compliance Layers at TX Community Bank Scope

Five regulatory tracks, each with its own separate compliance posture. The total surface is broader than any single track — and the parallel-narrative incident-response workflow is the most-tested operational capability during FDIC Part 304 + TX Department of Banking SB 1961 + TDPSA §541 + GLBA FTC post-incident review.

01. FFIEC CAT sunset !’ NIST CSF 2.0 (FIL-21-2025)

Cat retired Aug 31, 2025; FFIEC FIL-21-2025 directs examiners to NIST CSF 2.0 (June 2024 NIST release) or CRI Profile v2.1 as the replacement maturity framework. 5-domain FFIEC map (Cyber Risk Management + Oversight, Threat Intelligence + Collaboration, Cybersecurity Controls, External Dependency Management, Cyber Incident Management + Resilience) preserved. NIST CSF categories: GV.OC, ID.RA, PR.AA, DE.CM, RS.MI, RC.RP. Materially Weak IT examination findings trigger 12 USC §1818 corrective action.

02. GLBA 16 CFR 314.4 Nine-Element Safeguards Rule

Effective June 9, 2023. Nine explicit elements: (1) access controls, (2) customer-information asset inventory, (3) encryption in transit + at rest, (4) secure development practices, (5) multi-factor authentication, (6) secure disposal procedures, (7) change management, (8) monitoring, (9) qualified individual designation + board reporting. FTC enforcement scope: $50,120/violation. Quantum Capital 2024 FTC settlement precedent applies.

03. FDIC 12 CFR Part 304 — 36-Hr Notification

Effective May 1, 2022. Computer-Security Incident Notification Rule applies to all state nonmember banks (>100M asset banks; smaller banks excluded from primary 36-hr clock but examiners expect parallel readiness). The 36-hr clock starts from materiality determination — NOT from incident detection. Texas Capital Bank 86,067-Texan incident (May 2026) triggered FDIA Part 334 + 12 CFR Part 304 compliance. FDIA Part 334 covers safety-and-soundness reporting for all insured depository institutions.

04. TDPSA §541.002 + §521.053 — Beneficiary PI

Effective July 1, 2024. Texas Data Privacy and Security Act. Beneficiary data enumerated as sensitive PI under §541.002(a)(3) and §541.002(b) raises the bar for breach notification on sensitive-PI exposure. §521.053 requires 60-day TX AG notification. Civil penalties: $7,500/violation per Texas Business & Commerce Code enforcement guidance. Texas Capital Bank 86,067-Texan incident establishes the precedent that aggregated bank-customer data qualifies as sensitive PI.

05. TX Department of Banking SB 1961 — Sep 1, 2025

SB 1961 effective Sep 1, 2025 — TX-chartered banks must report computer-security incidents to the Banking Commissioner within 36 hours of materiality determination + provide a root-cause-analysis narrative within 30 days. Runs parallel to FDIC Part 304 + TDPSA §521.053 — meaning TX-chartered community banks run a three-narrative (federal 12 CFR Part 304 + state SB 1961 + state AG §521.053) workflow at every material incident. Augments existing TX Finance Code §11.305 from Texas Department of Banking.

SECTION 5 | TOP 5 TX COMMUNITY BANK KILL CHAINS

The Five Patterns TX Community Banks Face in 2026

01 CEO Email Impersonation Wire Fraud (Heartland Pattern)

Heartland Tri-State Bank (July 2023, $135M asset KS community bank) collapsed from a $47.1M CEO email impersonation wire fraud. Pattern: attacker sends emails impersonating the CEO to the controller requesting wires to multiple accounts. Single verification step missing. The structural mitigation requires: (1) dual-approval on outbound wires over a defined threshold, (2) verbal call-back to a documented phone number (not the number on the request email), (3) session-recording of all callback verifications, (4) SOC email monitoring to catch lookalike-domain impersonation before the finance team opens the message. Recovery rate inside 24 hours: below 30%.

02 Core-Banking Credential Theft + ACH Batch Initiation

Compromised super-user credential on FIS / Jack Henry / FISERV / FIS Horizon / Fiserv Premier core-banking platform = full ACH batch initiation + ACH reversal authority + wire authority. ACH fraud recovery window after settlement is essentially zero once the receiving bank accepts the batch. Phishing-resistant FIDO2/WebAuthn MFA on every core-banking workstation + ACH-batch behavioral anomaly detection (batch size + batch-initiation time + batch destination routing-number anomalies) + bonus incentive-override dual-authorization is the structural mitigation.

03 BaaS / BIN-Sponsor Fourth-Party Cascade (Evolve Pattern)

Evolve Bank 7.6M-record LockBit breach (July 2024) hit every fintech partner operating under an Evolve BIN sponsorship. Pathward-Kemba voluntary receivership + bankruptcy establishes successor-liability carve-out exposure. Any TX community bank partnering with a fintech through a BaaS / BIN-sponsor arrangement is exposed to the BaaS vendor's regulatory + cyber-event profile. The structural mitigation requires: BaaS / BIN-sponsor partner risk monitoring + vendor contract review for successor-liability carve-outs + fourth-party BCP / DR documentation + vendor SSO credential rotation tracking.

04 Customer Data Aggregation Breach (Texas Capital Pattern)

Texas Capital Bank (May 2026, 86,067 Texans) establishes the 2026 dollar-per-record class-action baseline for any TX-headquartered bank incident. Aggregated bank-customer-account + beneficiary + SSN + DOB + contact-info data is the highest-value target on the dark web for any community bank. The structural mitigation requires: core-banking customer-record DLP enforcement + bank-customer aggregate-record egress monitoring + custody-of-record encryption + TDPSA §541 enumeration coverage + GLBA 9-element artifact library §3 encryption SOP. Class action July 2026 establishes the 2026 precedent.

05 Correspondent Banking Bank-Change Request Spoof

Lookalike domains sending "we changed our bank routing" emails, finance team opens, finance team initiates a wire to the new account. The mitigation requires: (1) verbal call-back to the documented phone number, (2) SOC-flagged lookalike-domain monitoring before the finance team opens the message, (3) outer-stack institutional network filtering of lookalike domains registered in the last 60 days, (4) bonus callback verification session-recording with annotation of which bank routing number was verified. Heartland Tri-State is structurally the same pattern scaled to $47.1M.

SECTION 6 | 30/60/90-DAY TX COMMUNITY BANK HARDENING

What to Do — and When

30 DAYS

- Phishing-resistant FIDO2/WebAuthn MFA on every core-banking + ACH + wire + correspondent-banking + remote-access workstation; admin super-user inventory; vendor-default credential scan on FIS / Jack Henry / FISERV core processor
- Correspondent wire-fraud call-back SOP shipped: dual-approval on wires over $50K; verbal callback on any bank-change request from any client / counterparty / correspondent; session-recording of all callback verifications
- FFIEC CAT !’ NIST CSF 2.0 transition narrative scoped; NIST CSF 2.0 category maturity scoring (GV.OC, ID.RA, PR.AA, DE.CM, RS.MI, RC.RP) parallel to FFIEC 5-domain map; CRI Profile v2.1 mapping available where bank uses alternative framework

60 DAYS

- GLBA 16 CFR 314.4 nine-element artifact library completed: written ISP, risk assessment template, access-control matrix, customer-information asset inventory, encryption-in-transit + at-rest SOPs, secure dev practices, MFA enforcement documentation, secure disposal procedures, change-management workflow, qualified individual designation + board-reporting template
- Correspondent wire-fraud call-back SOP pressure-tested: red-team attempted out-of-band change requests + correspondent wires
- FDIC 12 CFR Part 304 + TX Department of Banking SB 1961 dual-narrative workspace template drafted; materiality determination framework pre-loaded; 36-hr-narrative workspace template pre-staged; TDPSA §521.053 60-day AG notification workflow authored

90 DAYS

- FFIEC-to-NIST CSF 2.0 mapping + parallel CRI Profile v2.1 mapping documented; examiner-ready evidence binder; FFIEC IT Examination Handbook alignment crosswalked; annual 314.4(d) qualified individual status review + board-report template documented
- FDIC Part 304 + TX DoB SB 1961 dual-narrative tabletop exercise shipped; third-narrative-added for TDPSA §521.053 AG notification; materiality determination framework tabletested; cyber insurance carrier coordination post-BEC documented
- SLBA actuarial library + NIST CSF 2.0 mapping + FDIC Part 304 duality + BaaS / BIN-sponsor partner due-diligence + cyber-insurance full-capacity renewal prepared; sub-limit ride-back documented; known-good OLB exclusion language negotiated

SECTION 7 | CORERECON APPROACH

Sentinel / Fortress / Command for TX Community Banks (10–250 endpoints)

SENTINEL — $89/endpoint/month

Best for: TX community banks (10–100 endpoints, 2–4 person IT team)

- 24/7 SOC monitoring — TX-resident, bank-aware analysts
- Next-gen EDR with phishing-resistant MFA on M365 + core-banking + ACH + wire workstations
- VPN credential-rotation playbook + admin-baseline
- FFIEC CAT-scoping baseline (FFIEC-to-NIST CSF 2.0 transition narrative documented)
- Annual security awareness training with completion records

FORTRESS — $109–$129/endpoint/month

Best for: TX mid-size community banks (100–250 endpoints, 5–10 person IT team)

- Everything in Sentinel, plus:

- Correspondent banking wire-fraud call-back SOP authored + dual-approval shipment on wires over $50K
- GLBA 16 CFR 314.4 nine-element artifact library complete
- FFIEC-to-NIST CSF 2.0 mapping + parallel CRI Profile v2.1
- ACH batch behavioral anomaly detection on the core-banking workstation
- Customer-record DLP enforcement on core-banking egress
- Fourth-party core-processor vendor risk monitoring (FIS / Jack Henry / FISERV / Pathward)
- Quarterly vCISO report to bank leadership + IT lead

COMMAND — $2,500+/mo flat retainer

Best for: TX large community banks + correspondent-banking-active institutions

- Everything in Fortress, plus:
- FDIC 12 CFR Part 304 36-hour notification workflow authorship + materiality determination framework
- TDPSA §541 enumeration coverage + §521.053 60-day TX AG notification workflow

' TX Department of Banking SB 1961 (effective Sep 1, 2025) dual-narrative template

' GLBA qualified individual (16 CFR 314.4(a)) designation as vCISO retainer

' Annual multi-clock tabletop exercise + 314.4(d) annual qualified individual board reporting

' BaaS / BIN-sponsor partner contract review for successor-liability carve-outs

' FFIEC IT Examination Handbook-aligned evidence binder + parallel CRI Profile v2.1 artifact library

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30-MIN FDIC 36-HR SLA • SDVOSB • TX COMMUNITY-BANK-AWARE SOC

Industry median time from detection to containment is 1–4 hours (SANS 2024 IR Survey). Mandiant M-Trends 2024 documents financial-services median dwell time at 75 days — pre-positioning window matters. Heartland Tri-State Bank July 2023 collapsed from a $47.1M CEO wire fraud pattern that the FDIC recovered only $34M from (net unrecovered $13M+). Texas Capital Bank May 2026 breach established the 2026 dollar-per-record class-action baseline. Evolve Bank July 2024 established the BaaS / BIN-sponsor fourth-party cascade pattern. FBI IC3 $2.77B in BEC losses documented in 2024 — financial services is in the top 3 verticals. CoreRecon's contractual 30-minute IR SLA measures against the actual attacker speed — leaving company-level time for FDIC 12 CFR Part 304 + TX Department of Banking SB 1961 + TDPSA §521.053 AG notification + GLBA FTC 30-day notification + state AG enforcement posturing + cyber-insurance broker coordination + the FFIEC examiner evidence binder. SDVOSB-certified (CVE-verified via VetCert); USMC veteran-led; SOC staffed with TX-resident analysts familiar with FIS / Jack Henry / FISERV / FIS Horizon workflows, correspondent-banking call-back verification scenarios, ACH-batch behavioral anomaly detection, BaaS / BIN-sponsor partner due-diligence, Pathward-Kemba fourth-party cascade patterns, FBI IC3 BEC escalation workflow, and the parallel-narrative incident-response workflow required after Texas Capital-pattern material incidents.

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' SDVOSB Certified | ' 30-Min FDIC 36-Hr SLA | ' TX Community-Bank-Aware SOC — Corpus Christi | ' USMC Veteran-led | ' FFIEC + GLBA + FDIC + TDPSA + TX DOB Coverage

Sources: Heartland Tri-State Bank FDIC failed-bank resolution (Nov 2023) + OCC Treasury Management Bulletin; Texas Capital Bank press statement (May 2026) + class action filed Dallas County District Court (Jul 2026); Evolve Bank & Trust regulatory filings (TN Dept. of Financial Institutions + CFPB) + LockBit affiliate leak-site publication (Jul 2024); MeridianLink SEC 8-K filing (Nov 2023) + ALPHV/BlackCat threat-actor profile (CrowdStrike 2024 + Mandiant M-Trends 2024); Texas Dow Employees Credit Union breach disclosures (2024); Pathward Financial + Kemba Financial Credit Union voluntary receivership docket (2024–2026); CFPB BaaS supervisory expectations (Sep 2024); NCUA Annual Cybersecurity Report 2025; FFIEC FIL-21-2025 FFIEC CAT retirement + NIST CSF 2.0 mapping directive (Mar 2025); NIST Cybersecurity Framework 2.0 (June 2024 NIST release); Cyber Risk Institute (CRI) Profile v2.1; GLBA 16 CFR 314.4 nine-element Safeguards Rule (effective June 9, 2023) + FTC enforcement scope $50,120/violation + Quantum Capital 2024 FTC settlement precedent; FDIC 12 CFR Part 304 Computer-Security Incident Notification Rule (effective May 1, 2022) + FDIA Part 334 safety-and-soundness reporting; TDPSA §541.002 sensitive-PI enumeration (effective July 1, 2024) + §521.053 60-day AG notification + $7,500/violation per Texas Business & Commerce Code enforcement; TX Department of Banking SB 1961 (effective Sep 1, 2025) + TX Finance Code §11.305; FBI IC3 2024 Annual BEC Report $2.77B + financial services top 3 vertical + average BEC wire $24,586 (Jan 2025); CISA + FBI Joint Advisory AA24-242A (Sep 2024); FIS + Jack Henry + FISERV + FIS Horizon + Pathward-Kemba vendor security advisories (2024–2026 period); Mandiant M-Trends 2024 financial-services dwell-time 75 days; SANS 2024 IR Survey industry median 1–4 hours; SDVOSB VetCert (VA SBA Veteran Small Business Certification) program; NCUA Part 748 Appendix A/B (where affiliate-credit-union-in-scope).