



NCBA Committed to Security (CTS) Program

Q&A with TRAKAmerica

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TRAKAmerica has made the decision to require vendors to obtain CTS or SOC 2 Type II certification. What's driving that requirement, and how should law firms and vendors think about what this means for their business moving forward?

Data security protocols have quickly escalated to “paramount” in the financial services industry. We see that small and medium-sized businesses are targeted with increased frequency, and too often fall prey to malicious actors. Having a consistent set of tested and certified data security standards aligned with PCI and other recognized programs will help create confidence that collection agencies and law firms and their suppliers will be able to withstand the inevitable attack that will come from these bad actors. Of course this doesn't mean there is zero risk, and we will all need to stay vigilant with our staff and continue to invest, but this is a critical step.

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How confident are you that CTS meets the majority of client due diligence needs?

I can only speak for TRAKAmerica and the standards that we require, which are directly aligned with our clients. And our clients are some of the most risk-intolerant banks in the nation. We have had our SVP of IT review the program extensively and do a gap assessment to ensure we are aligned. TRAK feels comfortable that the current standards meet the very high bar we have set. Further, we are confident that the CTS program is able to flex and grow to the ever-changing standards and future investments that will be required from law firms and their supply chain.

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How do you view the role of CTS compared to SOC 2 Type II, particularly given CTS's more dynamic, industry-specific approach to security and compliance?

Both provide an important cyber security audit to examine controls in an effort to protect and secure systems and data. While there are some differences between SOC 2 and CTS, there are a lot of similarities between the two programs. In some cases, CTS goes further than SOC 2 by including industry-specific areas of focus such as process servers. AI being added earlier this year was another great addition. And then of course the reports being available to interested clients in a centralized location. It's nice to have another option to SOC 2, providing an equivalent peace of mind while being tailored to the ARM industry.

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Why does TRAKAmerica encourage law firms to use the CTS program?

Many of the law firms in our network are medium-sized businesses. For those firms, it can be very difficult to make the proper investments to oversee the suppliers with whom they pass high risk personally identifiable information. As an example, TRAK has over 100 associates whose sole responsibilities are managing the law firms from a compliance and security perspective. I do not expect that law firms can make similar investments to oversee their process servers, BPOs, etc. But the data breach risk is no different than what we are trying to mitigate each day. Leveraging a program like CTS program for law firm suppliers will provide clients like TRAK and our clients the confidence that the oversight is meeting the very high (and growing) standards that are required to operate in this space.

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Why was it a no-brainer to have KnovaOne, a TRAKAmerica Company, participate in the CTS program? And why should other vendors participate?

Well first, we believe in the program and what better way to show that than participating and having another tool (CTS) to validate the strength of the KnovaOne (KO) environment. KO has their own SOC, plus our TRAK IT conducts oversight and now CTS is another layer of protection. Importantly, we understand how difficult it is to manage the never-ending series of audits from our clients. And KO faces the same challenge. Having an agreed upon set of standards, tested and validated, not only reduces risk, but significantly reduces the time investment by the KO team, answering essentially the same questions repeatedly, through the tedious and low-value questionnaire process.