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CISA Issues Binding Operational Directive to Change Federal Government's Vulnerability Management Approach

GOVERNANCE | HIGH

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Executive Summary

CISA has issued Binding Operational Directive 26-04, requiring all US Federal Civilian Executive Branch agencies to replace their KEV-catalog-centric vulnerability remediation model with a broader risk-based prioritization framework that weighs exploitation likelihood, asset criticality, and environmental context. Agencies must now maintain accurate asset inventories and implement continuous vulnerability assessment capabilities, with remediation timelines tied to risk tiers rather than confirmed exploitation status alone. The directive signals a structural shift in federal cyber posture, driven partly by AI-accelerated vulnerability discovery, and sets expectations that will likely influence downstream compliance frameworks and vendor security requirements across the public sector supply chain.

Technical Analysis

BOD 26-04 supersedes or modifies prior KEV-centric remediation obligations for FCEB agencies. The directive introduces a multi-factor risk scoring model incorporating: (1) exploitation likelihood, which extends beyond confirmed KEV status to include probabilistic indicators; (2) asset criticality based on function and data classification; and (3) environmental context such as network exposure and compensating controls. New remediation timelines are tiered by risk score rather than the binary KEV/non-KEV distinction. Agencies are required to maintain continuously updated asset inventories and deploy automated vulnerability assessment tooling capable of near-real-time coverage. The directive explicitly acknowledges AI-assisted vulnerability discovery and exploitation as a threat accelerant driving the policy change. No CVE IDs or CWE IDs are associated with this governance item. MITRE ATT&CK technique mapping is not applicable at the directive level.

Action Checklist

1. Step 1: Gap Assessment, Determine your current vulnerability management posture against BOD 26-04 requirements. Document whether existing processes rely primarily on KEV status as the remediation trigger. Identify gaps in asset inventory accuracy and continuous assessment coverage. Reference CIS 7.1 (Establish and Maintain a Vulnerability Management Process) and CIS 1.1 (Establish and Maintain Detailed Enterprise Asset Inventory) as baseline maturity benchmarks.
2. Step 2: Asset Inventory Validation, Audit your asset inventory for completeness, accuracy, and freshness. BOD 26-04 requires agencies to know what they have before they can score risk by criticality. Reference CIS 1.1 and CIS 2.1 (Establish and Maintain a Software Inventory). Flag assets with unknown ownership, classification, or network exposure status.
3. Step 3: Risk-Tier Framework Design, Develop or adapt a risk scoring methodology that incorporates exploitation likelihood, asset criticality, and environmental context. Map existing remediation SLAs to new risk tiers. Reference NIST SI-2 (Flaw Remediation) for the remediation workflow structure. Ensure the framework documents how KEV status integrates as one signal among several rather than the sole driver.
4. Step 4: Continuous Assessment Capability, Evaluate whether current vulnerability scanning tooling supports continuous or near-continuous coverage. Point-in-time monthly scans do not satisfy the directive's intent. Reference NIST SI-4 (System Monitoring) and CIS 7.3 (Perform Automated Operating System Patch Management) and CIS 7.4 (Perform Automated Application Patch Management) as operational benchmarks.
5. Step 5: Policy and Plan Updates, Revise the organization's vulnerability management policy, incident response plan, and any BOD 22-01 implementation documentation to reflect BOD 26-04 requirements. Reference NIST IR-8 (Incident Response Plan) and IR-1 (Policy and Procedures) for policy documentation structure. Schedule a tabletop or review cycle to validate the updated framework against a representative vulnerability backlog before the directive's compliance deadline.

IR / Forensic Enrichment

Triage Priority	STANDARD
Escalation Criteria	Escalate to agency CISO and legal counsel immediately if the gap assessment (Step 1) reveals that the agency has no documented vulnerability management process, has never implemented BOD 22-01 requirements, or cannot demonstrate any asset inventory capability — conditions that place the agency in material non-compliance with a binding federal directive and may trigger CISA oversight action or OMB reporting obligations.
Recovery Notes	BOD 26-04 compliance is an ongoing operational state, not a one-time remediation event — agencies must sustain continuous assessment coverage, maintain inventory freshness, and demonstrate risk-tiered remediation SLA adherence through recurring reporting cycles. After initial framework implementation, monitor for CISA supplemental guidance that may revise risk-tier definitions, EPSS threshold recommendations, or reporting cadence requirements. Conduct quarterly internal reviews of the risk-tier framework's performance against actual remediation throughput, specifically tracking whether high-EPSS non-KEV vulnerabilities are being closed within the new SLA targets, and adjust tier weights accordingly.

Forensic Artifacts	BOD 22-01 implementation records and KEV-remediation closure reports: These documents establish the pre-BOD-26-04 baseline and demonstrate whether the agency's prior model was purely KEV-triggered, which is the core compliance gap BOD 26-04 addresses. | Vulnerability scanner configuration exports and historical scan reports: Reveal scan frequency (monthly vs. continuous), authenticated vs. unauthenticated scan coverage, and subnet exclusion lists — all directly auditable against BOD 26-04's continuous assessment requirement. | CMDB or asset register exports with timestamps: Demonstrate inventory completeness and freshness; assets missing criticality classification, ownership, or network exposure status are direct evidence of the risk-scoring capability gap BOD 26-04 mandates be closed. | EPSS score pull logs and KEV catalog query records: If the agency was already pulling EPSS data or querying the KEV API, timestamps and query frequency demonstrate the degree to which exploitation-likelihood signals were previously integrated into prioritization decisions. | Remediation SLA tracking records and ticket closure data: Show actual mean time to remediate by vulnerability type and criticality tier, allowing auditors to assess whether the prior KEV-centric model systematically under-prioritized high-EPSS non-KEV vulnerabilities that BOD 26-04 now requires agencies to address.

Per-Action IR Details

Step 1: Gap Assessment — Determine your current vulnerability management posture against BOD 26-04 requirements. Document whether existing processes rely primarily on KEV status as the remediation trigger. Identify gaps in asset inventory accuracy and continuous assessment coverage. Reference CIS 7.1 (Establish and Maintain a Vulnerability Management Process) and CIS 1.1 (Establish and Maintain Detailed Enterprise Asset Inventory) as baseline maturity benchmarks.

NIST Phase: Preparation

Reference: NIST 800-61r3 §2 — Preparation: Establishing IR and vulnerability management capability baselines before an adverse event occurs

Controls: CIS 7.1 (IG1/IG2/IG3) — Establish and Maintain a Vulnerability Management Process, CIS 1.1 (IG1/IG2/IG3) — Establish and Maintain Detailed Enterprise Asset Inventory, NIST SI-5 (Security Alerts, Advisories, And Directives)

Compensating: Use a spreadsheet-based gap register comparing current VM policy documentation against each BOD 26-04 requirement clause. Run `nmap -sn ` or `arp-scan --localnet` to enumerate live hosts and compare against the existing asset register, flagging deltas as inventory gaps. A 2-person team can complete this with open-source tools in a structured 2-day assessment sprint.

Evidence: This is a governance posture step that does not alter live system state, so order-of-volatility sequencing does not apply. Collect and preserve: current vulnerability management policy documents and version history, existing BOD 22-01 implementation records (showing KEV-centric remediation triggers), historical scan reports demonstrating scan cadence and coverage gaps, and any prior gap assessment artifacts. These establish the pre-BOD-26-04 compliance baseline and will serve as the documentary record for audit purposes.

Step 2: Asset Inventory Validation — Audit your asset inventory for completeness, accuracy, and freshness. BOD 26-04 requires agencies to know what they have before they can score risk by criticality. Reference CIS 1.1 and CIS 2.1 (Establish and Maintain a Software Inventory). Flag assets with unknown ownership, classification, or network exposure status.

NIST Phase: Preparation

Reference: NIST 800-61r3 §2 — Preparation: Maintaining accurate asset inventories as a foundational IR capability required before risk-based prioritization is operationally viable

Controls: CIS 1.1 (IG1/IG2/IG3) — Establish and Maintain Detailed Enterprise Asset Inventory, CIS 1.2 (IG1/IG2/IG3) — Address Unauthorized Assets, CIS 2.1 (IG1/IG2/IG3) — Establish and Maintain a Software Inventory, CIS 2.2 (IG1/IG2/IG3) — Ensure Authorized Software is Currently Supported

Compensating: Deploy osquery with the `asset_inventory` and `listening_ports` tables to enumerate hardware, installed software, and network exposure per host: `osquery> SELECT name, version, install_date FROM programs;` combined with `SELECT address, port, protocol FROM listening_ports;`. For network-layer discovery without an agent, run `nmap -A -oX inventory_scan.xml ` and diff output against the existing CMDB. Flag any host with no recorded owner in the inventory as a BOD 26-04 criticality-scoring blocker.

Evidence: This step does not alter live system state. Preserve point-in-time snapshots of: the current CMDB or asset register export (with timestamps), network scan XML outputs showing all discovered hosts and open services, software inventory exports from any existing endpoint management tooling (e.g., SCCM, Ansible facts, or osquery results), and a list of assets with unknown classification or network exposure status. These artifacts document the pre-remediation inventory accuracy baseline required for BOD 26-04 compliance audits.

Step 3: Risk-Tier Framework Design — Develop or adapt a risk scoring methodology that incorporates exploitation likelihood, asset criticality, and environmental context. Map existing remediation SLAs to new risk tiers. Reference NIST SI-2 (Flaw Remediation) for the remediation workflow structure. Ensure the framework documents how KEV status integrates as one signal among several rather than the sole driver.

NIST Phase: Preparation

Reference: NIST 800-61r3 §2 — Preparation: Developing prioritization criteria and remediation workflows as pre-incident governance capability required by BOD 26-04's shift away from KEV-only triggering

Controls: NIST SI-2 (Flaw Remediation), CIS 7.1 (IG1/IG2/IG3) — Establish and Maintain a Vulnerability Management Process, CIS 7.2 (IG1/IG2/IG3) — Establish and Maintain a Remediation Process

Compensating: Build the risk-tier scoring matrix in a version-controlled spreadsheet or YAML file incorporating CVSS base score, EPSS score (freely available via first.org/epss API), KEV status (boolean), asset criticality tier (manually assigned from Step 2 inventory), and internet exposure flag. Define three remediation SLA tiers: Critical (EPSS >0.7 or KEV=true on Tier-1 asset: 15 days), High (EPSS 0.3–0.7 or KEV=true on Tier-2 asset: 30 days), Standard (remaining: 180 days). Document the weighting rationale to satisfy BOD 26-04's requirement for an auditable methodology.

Evidence: This is a policy design step with no live system state impact. Document and preserve: the prior remediation SLA policy (showing KEV-centric trigger logic), the draft risk-tier framework document with version control history, EPSS data snapshots used during calibration, and meeting notes or sign-off records from stakeholders who approved the new scoring weights. This documentation chain demonstrates BOD 26-04 compliance intent and supports future audits.

Step 4: Continuous Assessment Capability — Evaluate whether current vulnerability scanning tooling supports continuous or near-continuous coverage. Point-in-time monthly scans do not satisfy the directive's intent. Reference NIST SI-4 (System Monitoring) and CIS 7.3 (Perform Automated Operating System Patch Management) and CIS 7.4 (Perform Automated Application Patch Management) as operational benchmarks.

NIST Phase: Preparation

Reference: NIST 800-61r3 §2 — Preparation: Implementing continuous monitoring tooling and automated patch management capability as infrastructure required before BOD 26-04 risk-tiered remediation workflows can be operationalized

Controls: NIST SI-4 (System Monitoring), CIS 7.3 (IG1/IG2/IG3) — Perform Automated Operating System Patch Management, CIS 7.4 (IG1/IG2/IG3) — Perform Automated Application Patch Management, NIST SI-2 (Flaw Remediation)

Compensating: Deploy OpenVAS (Greenbone Community Edition) configured for credentialed scans on a 7-day rolling schedule rather than monthly, targeting all subnets identified in Step 2. Complement with osquery scheduled queries (`SELECT * FROM patches WHERE installed_on < date('now','-30 days');`) running every 6 hours to detect stale patch state. For OS patching cadence, configure unattended-upgrades (Linux) or Windows Update Group Policy with `AUOptions=4` to auto-download and schedule installation, producing patch logs reviewable against SLA tiers defined in Step 3.

Evidence: This step evaluates and reconfigures scanning tooling but does not alter production system state directly. Preserve: current scanner configuration exports showing scan frequency and scope (as proof of prior point-in-time-only cadence), scan coverage reports showing which subnets or hosts are excluded, and patch management policy settings

screenshots or GPO exports. These artifacts establish the pre-BOD-26-04 scanning capability baseline and document the gap that justifies the tooling changes.

Step 5: Policy and Plan Updates — Revise the organization's vulnerability management policy, incident response plan, and any BOD 22-01 implementation documentation to reflect BOD 26-04 requirements. Reference NIST IR-8 (Incident Response Plan) and IR-1 (Policy and Procedures) for policy documentation structure. Schedule a tabletop or review cycle to validate the updated framework against a representative vulnerability backlog before the directive's compliance deadline.

NIST Phase: Post Incident

Reference: NIST 800-61r3 §4 — Post-Incident Activity: Updating IR plans, policies, and procedures based on lessons learned and new directive requirements to improve organizational resilience and compliance posture

Controls: NIST IR-8 (Incident Response Plan), NIST IR-1 (Policy And Procedures), NIST IR-3 (Incident Response Testing), CIS 7.1 (IG1/IG2/IG3) — Establish and Maintain a Vulnerability Management Process

Compensating: Use a free tabletop facilitation template (CISA's Tabletop Exercise Packages are publicly available at cisa.gov) adapted to walk through the new risk-tier framework against a sample of 10–20 real vulnerabilities from the agency's current scanner backlog — specifically selecting a mix of KEV-listed and non-KEV high-EPSS findings to stress-test the new prioritization logic. Track policy document version changes in a free Git repository (GitHub or GitLab) to maintain an auditable revision history demonstrating BOD 26-04 compliance effort.

Evidence: This step is a documentation and testing activity with no production system state impact. Preserve: the prior version of the IR plan and VM policy (demonstrating BOD 22-01-era KEV-centric language), the redlined or diff-annotated updated policy documents, tabletop exercise scenario packages and after-action reports, and a sign-off log showing authorizing official review before the BOD 26-04 compliance deadline. These records constitute the primary compliance evidence package for CISA oversight review.

Detection Guidance

BOD 26-04 is a governance directive, not a technical vulnerability. Detection in this context means compliance posture monitoring rather than IOC hunting. To assess whether your agency or organization is operationally aligned: (1) Query your vulnerability management platform for the ratio of remediated vulnerabilities driven solely by KEV status versus multi-factor risk score; a high KEV-only ratio indicates a significant gap in risk-based prioritization. (2) Run an asset inventory reconciliation against network scan results using NIST SI-4 (System Monitoring) requirements; unmatched assets represent blind spots the directive specifically targets. (3) Review patch aging reports filtered by asset criticality tier; if high-criticality assets carry older unpatched vulnerabilities not on KEV, that is the risk the directive addresses. (4) Check whether your SIEM or vulnerability management tooling can ingest exploitation likelihood feeds beyond the KEV catalog (e.g., EPSS scores, threat intelligence enrichment). Absence of that data pipeline is a direct capability gap under BOD 26-04. Reference NIST AU-6 (Audit Record Review, Analysis, and Reporting) for log review cadence requirements supporting continuous posture visibility.

Framework Mappings

NIST-800-53R5

- **SI-2** — Flaw Remediation

CIS-V8

- **7.3** — Perform Automated Operating System Patch Management

- **7.4** — Perform Automated Application Patch Management

ISO-27001-2022

- **A.8.8** — Management of technical vulnerabilities

Sources

Source	URL	Tier
CISA: Home Page	https://www.cisa.gov/	**T1**
BOD 26-04: Prioritizing Security Updates Based on Risk - CISA	https://www.cisa.gov/news-events/directives/bod-26-04-prioritizing-...	**T1**
CISA Issues New Directive Improving How Federal Agencies ...	https://www.cisa.gov/news-events/news/cisa-issues-new-directive-imp...	**T1**
CISA Directive Highlights Risk-Based Vulnerability Management	https://www.wiley.law/alert-CISA-Directive-Highlights-Risk-Based-Vu...	**T3**
Cybersecurity Directives - CISA	https://www.cisa.gov/news-events/directives	**T1**

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