INTELLIGENCE BRIEFING
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EO 14409 Reshapes Federal AI Security: Classified Benchmarks, Voluntary Frameworks, and the Accountability Gap

GOVERNANCE | MEDIUM | CVSS 5.0

SCC Item ID	SCC-GOV-2026-0065
Type	Governance
Severity	MEDIUM
CVSS Base Score	5.0
Affected Products	Federal agency AI deployments, CrowdStrike Falcon platform, Charlotte AI, Frontier AI Readiness and Resilience Service, Project QuiltWorks (industry coalition), NVIDIA Vera BlueField-4 STX; broadly affects critical infrastructure and enterprise environments with agentic AI deployments
Discovery Source	Rss:T1 Threatintel

Executive Summary

President Trump signed Executive Order 14409 on June 2, 2026, directing federal agencies to strengthen defenses against AI-enabled threats and establishing a CISA-managed voluntary AI cybersecurity clearinghouse. The order affects all federal agency AI deployments and, by market influence, enterprise and critical infrastructure operators using agentic AI systems. Specific platforms affected include CrowdStrike Charlotte AI and similar autonomous AI agent frameworks. The primary business risk is a compliance ambiguity gap: classified benchmarking criteria are inaccessible to non-federal operators, and the voluntary framework creates uneven accountability across sectors, leaving organizations uncertain about their actual compliance posture.

Technical Analysis

EO 14409 introduces four technical governance provisions with direct security architecture implications. First, a classified benchmarking process evaluates frontier AI models before federal deployment; non-federal operators cannot access benchmark criteria, creating a transparency deficit for third-party compliance assessments. Second, a voluntary AI vulnerability clearinghouse under CISA will aggregate AI-specific vulnerability intelligence and best practices, but participation is not mandatory. Third, 30-60 day action timelines are assigned to CISA, NSA, Treasury, and DHS, affecting procurement and integration timelines for vendors serving federal customers. Fourth, the rejection of mandatory preclearance removes a systemic control gate, increasing

risk from unvetted agentic AI deployments.

Relevant CWEs: CWE-1059 (Incomplete Documentation) reflects the classified benchmark transparency gap; CWE-693 (Protection Mechanism Failure) maps to the absence of mandatory preclearance; CWE-284 (Improper Access Control) applies to expanded identity attack surfaces from agentic AI (T1078, T1586). Supply chain risk (T1195, T1588, T1588.006) is elevated by open-source AI dependency exposure. Cloud administration abuse (T1651) and exploitation of public-facing AI services (T1190) represent secondary technical vectors introduced by agentic deployment patterns. No CVE is associated with this item. Project QuiltWorks (a CrowdStrike-led industry coalition) and Frontier AI Readiness and Resilience Service are marketed as EO 14409-aligned by their vendors, but independent verification against classified benchmarks is not possible for non-federal operators.

Action Checklist

1. Step 1: Inventory all agentic AI deployments across your environment, including third-party integrations (e.g., CrowdStrike Charlotte AI, autonomous workflow orchestration platforms) and open-source models, and flag those with privileged identity access or cloud administration capabilities (T1078, T1651); document findings per CIS 1.1 (Establish and Maintain Detailed Enterprise Asset Inventory)
2. Step 2: Detection, review identity and access logs for anomalous service account activity associated with AI agents; query SIEM for T1078 (Valid Accounts) and T1651 (Cloud Administration Command) patterns; enable logging per NIST AU-2 (Event Logging) and AU-12 (Audit Record Generation) across all AI-integrated systems; monitor CISA's voluntary clearinghouse for AI-specific vulnerability intelligence and best practices as it becomes operational
3. Step 3: Eradication, apply least-privilege constraints to all AI agent service accounts per NIST AC-6 (Least Privilege) and CIS 5.4 (Restrict Administrator Privileges to Dedicated Administrator Accounts); revoke or scope down any over-permissioned accounts used by agentic AI workflows; assess open-source AI dependencies for unvetted components (T1195, T1588)
4. Step 4: Recovery, validate that AI agent identity scopes are enforced after access restriction changes; confirm audit logging continuity per NIST AU-9 (Protection of Audit Information) and AU-11 (Audit Record Retention); re-run access control reviews on AI-integrated cloud administration paths and document findings for compliance evidence
5. Step 5: Post-Incident, map your AI governance posture against EO 14409 provisions that are not classified; document where your organization cannot achieve transparency due to classified benchmark inaccessibility; establish a process to monitor CISA clearinghouse publications and integrate findings into your vulnerability management program per CIS 7.1 (Establish and Maintain a Vulnerability Management Process); review CWE-1059, CWE-693, and CWE-284 control gaps exposed by agentic AI adoption

IR / Forensic Enrichment

Triage Priority	STANDARD
Escalation Criteria	Escalate to urgent if discovery of AI agent service accounts with active Global Admin, Organization Admin, or unrestricted cloud-administration IAM permissions that cannot be immediately scoped down, or if CISA's voluntary clearinghouse publishes an AI-specific IOC matching a Charlotte AI, NVIDIA Vera BlueField-4 STX, or agentic workflow component present in your environment.

Recovery Notes	Post-containment, maintain continuous monitoring of all AI agent service account authentications for a minimum of 30 days using whatever log source is available (CloudTrail, Entra Sign-In Logs, Falcon Audit), watching specifically for any attempted use of the previously over-permissioned scope — this would indicate either credential persistence that was missed in eradication or a secondary identity path not captured in the inventory. Re-run the full AI asset and account inventory every 30 days until CISA's voluntary clearinghouse is operational and producing AI-specific guidance, as the EO 14409 compliance landscape will evolve as classified benchmark provisions are partially declassified or operationalized. Document all monitoring outcomes against the compliance evidence package initiated in Step 4 to support any future federal audit or CISA inquiry.
Forensic Artifacts	CrowdStrike Falcon Console Audit Logs (Activity > Audit Logs): captures all Charlotte AI agent invocations, API calls made under the AI agent identity, and any privilege escalation attempts within the Falcon platform — the primary artifact for establishing what the AI agent did and under what identity context | AWS CloudTrail Management and Data Events filtered to AI agent IAM role ARNs: records every AssumeRole, CreateAccessKey, AttachRolePolicy, and cloud administration API call executed by agentic AI workflows integrated with NVIDIA Vera BlueField-4 STX or other cloud-connected AI infrastructure | Azure Entra ID / AAD Sign-In Logs and Service Principal Audit Logs: documents all OAuth token issuances, consent grants, and API permissions exercised by Charlotte AI's Entra-registered application identity, with correlation to any anomalous consent or permission escalation events | AI workflow dependency manifest snapshots (requirements.txt, package-lock.json, or conda environment exports) from agentic AI deployment hosts: establishes the open-source component baseline for supply chain integrity review under the EO 14409 unvetted-component risk surface | CISA Voluntary AI Cybersecurity Clearinghouse publications and IOC feeds (once operational): the authoritative external artifact source for AI-specific threat indicators relevant to federal and enterprise agentic AI deployments affected by EO 14409

Per-Action IR Details

Step 1: Inventory — audit all agentic AI deployments across your environment, including third-party integrations (e.g., Charlotte AI, NVIDIA Vera BlueField-4 STX-connected systems), and flag those with privileged identity access or cloud administration capabilities (T1078, T1651); cross-reference against CIS 1.1 (Establish and Maintain Detailed Enterprise Asset Inventory)

NIST Phase: Preparation

Reference: NIST 800-61r3 §2 — Preparation: establishing asset visibility as a precondition for detecting and responding to AI-agent-related identity abuse

Controls: CIS 1.1 (Establish and Maintain Detailed Enterprise Asset Inventory), CIS 2.1 (Establish and Maintain a Software Inventory), NIST AC-2 (Account Management)

Compensating: For teams without a CMDB or enterprise asset management tool: run `Get-ADServiceAccount -Filter *` (Windows) or `aws iam list-roles --query 'Roles[?contains(RoleName, \`ai\`) || contains(RoleName, \`charlotte\`) || contains(RoleName, \`agent\`)]'` to enumerate AI-associated service accounts and IAM roles. Cross-reference against CrowdStrike Charlotte AI OAuth app registrations in your IdP (Entra ID: `Get-MgApplication | Where-Object {$_.DisplayName -match 'Charlotte|CrowdStrike|AI'}`). Document each identity with its assigned permissions scope.

Evidence: This is a preparatory inventory step and does not alter live state. No volatile capture is required before execution. However, snapshot current IAM policy assignments for all flagged AI service accounts before any subsequent containment actions — export `aws iam get-policy-version` or Entra ID conditional access policy states — so you have a pre-change baseline if rollback is needed.

Step 2: Detection — review identity and access logs for anomalous service account activity associated with AI agents; query SIEM for T1078 (Valid Accounts) and T1651 (Cloud Administration Command) patterns; enable logging per NIST AU-2 (Event Logging) and AU-12 (Audit Record Generation) across all AI-integrated systems; monitor CISA's voluntary clearinghouse for AI-specific IOCs as it becomes operational

NIST Phase: Detection Analysis

Reference: NIST 800-61r3 §3.2 — Detection and Analysis: correlating identity telemetry from AI agent service accounts to distinguish legitimate orchestration from abuse or over-permissioned execution

Controls: NIST AU-2 (Event Logging), NIST AU-6 (Audit Record Review, Analysis, And Reporting), NIST AU-12 (Audit Record Generation), CIS 8.2 (Collect Audit Logs)

Compensating: Without a SIEM, use osquery to query service account authentication events: `SELECT * FROM last WHERE username LIKE '%ai%' OR username LIKE '%charlotte%';` and `SELECT * FROM process_open_sockets WHERE pid IN (SELECT pid FROM processes WHERE name = 'falcon-sensor');`. For cloud-side visibility, enable AWS CloudTrail data events and query with Athena for `eventName IN ('AssumeRole','CreateAccessKey','AttachRolePolicy')` filtered to AI-agent IAM roles. For on-prem, deploy a Sigma rule matching Windows Security Event ID 4648 (explicit credential use) and 4672 (special privilege logon) for service accounts associated with Charlotte AI or agentic workflow identities.

Evidence: Before enabling new logging (which may roll existing buffers), capture: current Windows Security Event Log (export via `wevtutil epl Security C:\IR\security_pre_logging.evtx`), existing AWS CloudTrail S3 bucket contents for the past 30 days, and any Charlotte AI audit logs accessible via the CrowdStrike Falcon console under Activity > Audit Logs. These baselines establish what was visible before logging gaps were closed and are critical for establishing a timeline of any prior AI agent misuse.

Step 3: Eradication — apply least-privilege constraints to all AI agent service accounts per NIST AC-6 (Least Privilege) and CIS 5.4 (Restrict Administrator Privileges to Dedicated Administrator Accounts); revoke or scope down any over-permissioned accounts used by agentic AI workflows; assess open-source AI dependencies for unvetted components (T1195, T1588)

NIST Phase: Eradication

Reference: NIST 800-61r3 §3.4 — Eradication: removing over-permissioned AI agent identity configurations that represent the exploitable attack surface under EO 14409's accountability gap

Controls: NIST AC-6 (Least Privilege), NIST AC-2 (Account Management), CIS 5.4 (Restrict Administrator Privileges to Dedicated Administrator Accounts), CIS 2.3 (Address Unauthorized Software)

Compensating: Without PAM tooling, use PowerShell to scope down Charlotte AI service account permissions: remove Global Admin or Cloud Application Admin roles and replace with a custom role scoped to only the Falcon API permissions documented in CrowdStrike's Charlotte AI deployment guide. For AWS-side NVIDIA Vera BlueField-4 STX integrations, apply IAM permission boundaries: `aws iam put-role-permissions-boundary --role-name --permissions-boundary arn:aws:iam::aws:policy/PowerUserAccess` as an interim constraint. For open-source AI dependency review, run `pip-audit` or `npm audit` against the AI workflow's dependency tree and flag any package sourced outside approved registries.

Evidence: CRITICAL — volatile capture required before revoking or scoping AI agent credentials. Before modifying any service account or IAM role: (1) export the full current permission set (`aws iam get-role --role-name ` and `aws iam list-attached-role-policies`); (2) capture active sessions for the AI agent identity (`aws sts get-caller-identity` from any active agent process, Windows: `query session` and `Get-WmiObject Win32_LogonSession`); (3) record active network connections from AI agent processes (`Get-NetTCPConnection -OwningProcess ` for Charlotte AI service PIDs). These captures document the blast radius of over-permissioned access before it is removed.

Step 4: Recovery — validate that AI agent identity scopes are enforced after access restriction changes; confirm audit logging continuity per NIST AU-9 (Protection of Audit Information) and AU-11 (Audit Record Retention); re-run access control reviews on AI-integrated cloud administration paths and document findings for compliance evidence

NIST Phase: Recovery

Reference: NIST 800-61r3 §3.5 — Recovery: verifying that least-privilege enforcement on AI agent identities is functioning as intended and that logging integrity is maintained for future audit and compliance use

Controls: NIST AU-9 (Protection Of Audit Information), NIST AU-11 (Audit Record Retention), NIST AC-3 (Access Enforcement), CIS 6.2 (Establish an Access Revoking Process)

Compensating: Without an IGA platform, manually validate enforced scopes by attempting a privilege escalation test using the AI agent's restricted credentials in a non-production clone: confirm the identity cannot execute `AssumeRole` into admin-level roles or invoke `iam:AttachRolePolicy`. For logging continuity, verify that CloudTrail, Entra ID Sign-In Logs, and Falcon audit logs are writing successfully post-change by checking for a known event (e.g., a test login) appearing within 5 minutes in each log destination. Document all findings in a dated evidence package (screenshots, CLI output exports) mapped to EO 14409 compliance requirements.

Evidence: Before re-running access control reviews, confirm that no new unauthorized access occurred during the eradication window by querying for AI agent identity activity in the gap period: AWS CloudTrail `LookupEvents` filtered to the AI role ARN between eradication start and completion timestamps; Windows Security Event ID 4624/4648 for the Charlotte AI service account in the same window. This gap-period audit is the forensic record that the constrained identity was not abused during the transition and is the primary compliance evidence artifact for EO 14409 accountability documentation.

Step 5: Post-Incident — map your AI governance posture against EO 14409 provisions that are not classified; document where your organization cannot achieve transparency due to classified benchmark inaccessibility; establish a process to monitor CISA clearinghouse publications and integrate findings into your vulnerability management program per CIS 7.1 (Establish and Maintain a Vulnerability Management Process); review CWE-1059, CWE-693, and CWE-284 control gaps exposed by agentic AI adoption

NIST Phase: Post Incident

Reference: NIST 800-61r3 §4 — Post-Incident Activity: translating lessons from the EO 14409 compliance gap into durable governance improvements, updated detection capability, and a repeatable process for integrating CISA AI clearinghouse intelligence

Controls: CIS 7.1 (Establish and Maintain a Vulnerability Management Process), CIS 7.2 (Establish and Maintain a Remediation Process), NIST AU-13 (Monitoring For Information Disclosure)

Compensating: Assign a team member to subscribe to CISA's AI Security advisories (https://www.cisa.gov/ai — validate on access) and create a monthly calendar review to check the voluntary clearinghouse once operational. Use a free GRC tracking spreadsheet to log each EO 14409 provision, your current control mapping, and documented gaps where classified benchmark access is unavailable — this becomes your accountability evidence. For CWE gap review, use OWASP's free LLM Top 10 (2025 edition) as a proxy framework to structure agentic AI risk assessment where EO 14409 benchmarks are classified and inaccessible.

Evidence: No live state is altered in this step; no volatile capture is required. The primary evidence artifacts to produce are: (1) a dated AI asset inventory snapshot from Step 1 as the baseline; (2) the permission change audit log from Steps 3–4 as proof of remediation; (3) a written gap analysis document mapping EO 14409's unclassified provisions to your current controls, with explicit notation of classified benchmark sections your organization cannot self-assess against. This documentation package constitutes the post-incident record and the starting posture for ongoing compliance monitoring.

Detection Guidance

No IOCs are associated with this governance item. Detection focus is on behavioral and configuration signals introduced by agentic AI deployments.

Identity abuse (T1078, T1586): Query authentication logs for service accounts associated with AI agents authenticating outside expected hours, from unexpected source IPs, or accessing resources outside their documented scope. Flag any AI agent account with interactive logon events.

Cloud administration abuse (T1651): In cloud provider logs (AWS CloudTrail, Azure Activity Log, GCP Audit Logs), alert on API calls from AI agent service principals that invoke privileged administrative actions (e.g., role assignments, policy modifications, secret retrieval).

Supply chain exposure (T1195, T1588, T1588.006): Inventory open-source AI model dependencies; alert on new or unsigned model artifacts introduced into deployment pipelines. Cross-reference model provenance against CISA clearinghouse publications as they become available.

Public-facing AI exploitation (T1190): Review WAF and API gateway logs for anomalous query patterns targeting AI inference endpoints, including prompt injection attempts and unexpected payload sizes.

Relevant NIST controls for logging coverage: AU-2, AU-3, AU-6, AU-12. Apply D3-LAM (Local Account Monitoring) for AI agent accounts and D3-UAP (User Account Permissions) reviews for privilege scope validation.

Framework Mappings

MITRE-ATTACK

- **T1078** — Valid Accounts
- **T1588.006** — Vulnerabilities
- **T1651** — Cloud Administration Command
- **T1586** — Compromise Accounts
- **T1588** — Obtain Capabilities
- **T1195** — Supply Chain Compromise
- **T1190** — Exploit Public-Facing Application

NIST-800-53R5

- **AC-2** — Account Management
- **AC-6** — Least Privilege
- **IA-2** — Identification and Authentication (Organizational Users)
- **IA-5** — Authenticator Management
- **SA-9** — External System Services
- **SR-2** — Supply Chain Risk Management Plan
- **SR-3** — Supply Chain Controls and Processes
- **SI-7** — Software, Firmware, and Information Integrity
- **CA-8** — Penetration Testing
- **RA-5** — Vulnerability Monitoring and Scanning
- **SC-7** — Boundary Protection
- **SI-2** — Flaw Remediation
- **AC-3** — Access Enforcement
- **SI-4** — System Monitoring
- **IR-5** — Incident Monitoring

OWASP-TOP10-2021

- **A01:2021** — Broken Access Control

CIS-V8

- **6.1** — Establish an Access Granting Process
- **6.2** — Establish an Access Revoking Process
- **8.2** — Collect Audit Logs

SOC2-TSC

- **CC6.1** — The entity implements logical access security software, infrastructure, and architectures over protected information assets

HIPAA-SECURITY

- **164.312(a)(1)** — Access Control

ISO-27001-2022

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

NIST-CSF-2

- **DE.CM-01** — Networks and network services are monitored
- **DE.AE-08** — Incidents are declared when adverse events meet the defined incident criteria

MITRE ATT&CK Mapping

Technique ID	Technique Name	Tactic
T1078	Valid Accounts	Defense-Evasion
T1588.006	Vulnerabilities	Resource-Development
T1651	Cloud Administration Command	Execution
T1586	Compromise Accounts	Resource-Development
T1588	Obtain Capabilities	Resource-Development
T1195	Supply Chain Compromise	Initial-Access
T1190	Exploit Public-Facing Application	Initial-Access

Sources

Source	URL	Tier
Blog	https://www.crowdstrike.com/en-us/blog/after-executive-order-14409-...	T3
	https://perkinscoie.com/insights/update/white-house-issues-executiv...	T3
	https://techpolicy.press/transparency-and-accountability-gaps-in-tr...	T3

Source	URL	Tier
	https://industrialcyber.co/regulation-standards-and-compliance/whit...	T3
CrowdStrike Launches Project QuiltWorks Industry-Wide Coalition	https://www.crowdstrike.com/en-us/press-releases/crowdstrike-launch...	T3

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