

# Baseline Nonbank Cybersecurity Exam Program – Release Notes

Released Date: 10/24/2024

Exam Program Version: Version 1.1

Release Details: Updates include rewording questions, adjusting their order, and modifying citations related to the FTC Safeguards Rule.

Exam Program Updates:

## AUDIT

- No changes.

## DEVELOPMENT & ACQUISITION

- 2/D&A-01: Change citation to 314.3(a)
- 4/D&A-06: Add citation 314.4(c)(2)

## MANAGEMENT

- 6/MGMT-02:
  - Wording updated to: Does management have a program to ensure all information security personnel, including key personnel, are kept up to date with respect to changing information security threats and countermeasures?
  - Added FTC citations 314.4(e)(3) and 314.4(e)(4)
- 19/MGMT-33: Change citation to 314.4(e)(1)

## SUPPORT & DELIVERY

- 23/S&D-4: Change citation to 314.4(c)(1)
- 25/S&D-17: Previously question S&D-94. Moved to align with other questions.
- 26/S&D-21: Change citation to 314.4(c)
- 27/S&D-22: Change citation to 314.4(c)
- 28/S&D-25: Change citation to 314.4(c)
- 29/S&D-26: Change citation to 314.4(c)

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Released Date: 06/30/2023

Exam Program Version: Version 1.1

Release Details: A typo was corrected, and two updates were made to FTC Safeguard Rule citations.

Exam Program Updates:

#### AUDIT

- No changes.

#### DEVELOPMENT & ACQUISITION

- No changes

#### MANAGEMENT

- No changes

#### SUPPORT & DELIVERY

- **29/S&D-34: MODIFIED QUESTION.** Replaced “or” with “for”. The updated question states: What is the institution’s process for applying security patches **for** organizational assets?
- **31/S&D-36: CITATION CHANGE.** Removed incorrect citation of **16 CFR 314.4(c)(2)**. No citation applicable.
- **53/S&D-95: CITATION CHANGE.** Removed incorrect citation of **16 CFR 314.4(c)(8)**. No citation applicable.

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Released Date: 03/21/2023

Exam Program Version: Version 1.1

Release Details: CSBS released an update to the Baseline Nonbank Cybersecurity Exam Program. This update, Version 1.1, contains changes to FTC Safeguards Rule citation references, as well as a few reorganized and consolidated questions.

Exam Program Updates:

#### GENERAL

- Changes to question numbering were necessary due to movement and modification of questions noted below.

#### AUDIT

- No changes.

## DEVELOPMENT & ACQUISITION

- **3/D&A-05: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(4)** with **16 CFR 314.4(c)(7)**.

## MANAGEMENT

- **6/MGMT-03: QUESTION MOVEMENT.** Was previously **Question 7/MGMT-04**.
- **10/MGMT-07: MODIFIED QUESTION.** Modified question to address that “Qualified Individual” may be employed by the entity, an affiliate, or a service provider. This more closely matches FTC Safeguards Rule language.
- **12/MGMT-10: QUESTION MOVEMENT/MODIFIED QUESTION.** Was previously **Question 6/MGMT-02**. Modified question to address monitoring of all user activities. Removed specific references to employees and vendors.
- **15/MGMT-20: CITATION CHANGE.** Removed incorrect citation of **16 CFR 314.4(i)**. No citation applicable.
- **18/MGMT-32: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(8)** with **16 CFR 314.4(d)**.

## SUPPORT & DELIVERY

- **29/S&D-34: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(8)** with **16 CFR 314.4(c)(2)**.
- **30/S&D-35: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(8)** with **16 CFR 314.4(c)(2)**.
- **31/S&D-36: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(8)** with **16 CFR 314.4(c)(2)**.
- **35/S&D-49: CITATION CHANGE/MODIFIED QUESTION.** Added citation of **16 CFR 314.4(c)(1)**. Modified question to place emphasis on MFA requirements contained in FTC Safeguards Rule.
- **36/S&D-54: CITATION CHANGE.** Replaced incorrect citation of **16 CFR 314.4(c)(8)** with **16 CFR 314.4(c)(1)**.
- **38/S&D-56: CITATION CHANGE.** Added citation of **16 CFR 314.4(c)(2)**.
- **39/S&D-68: CITATION CHANGE.** Added citation of **16 CFR 314.3(b)**.
- **41/S&D-71: CITATION CHANGE/MODIFIED QUESTION.** Added citation of **16 CFR 314.4(d)(1)**. Replaced “at least annually” with “regularly” to more closely mirror language in FTC Safeguards Rule.
- **42/S&D-72: CITATION CHANGE.** Added citation of **16 CFR 314.4(d)(1)**.
- **43/S&D-75: CITATION CHANGE/QUESTION MOVEMENT/MODIFIED QUESTION.** Added citation of **16 CFR 314.4(g)**. Combined **Questions 43/S&D-75** and **44/S&D-76** from Version 1.0. Modified question to address development, tracking, and regular review of identified testing gaps in a single question.
- **44/S&D-76: CITATION CHANGE.** Added citation of **16 CFR 314.4(c)(2)**.

- **45/S&D-77:** CITATION CHANGE. Added citations of **16 CFR 314.4(c)(2)** and **16 CFR 314.4(d)(1)**.
- **51/S&D-93:** CITATION CHANGE/MODIFIED QUESTION. Added citations of **16 CFR 314.4(d)(1)** and **16 CFR 314.4(h)(7)**. Modified question to address incident response plan testing and review considerations after a cyber incident, as well as annual testing.
- **53/S&D-95:** CITATION CHANGE. Replaced incorrect citation of **16 CFR 314.4(c)(6)** with **16 CFR 314.4(c)(8)**.