

Enhanced 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:

Question Number	Update
Audit-02	Add citation 314.4(d)(1)
Audit-03	Add citation 314.4(d)(1)
Audit-04	Add citation 314.4(d)(1)
Audit-05	Add citation 314.4(d)(1)
Audit-06	Add citation 314.4(d)(1)
Audit-07	Add citation 314.4(d)(1)
Audit-08	Add citation 314.4(d)(1)
Audit-09	Add citation 314.4(d)(1)
Audit-10	Add citation 314.4(d)(1)
Audit-11	Add citation 314.4(d)(1)
Audit-12	Add citation 314.4(d)(1)
Audit-13	Add citation 314.4(d)(1)
D&A-01	Change citation to 314.3(a)
MGMT-02	<ul style="list-style-type: none">• Wording changed 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?• Add citations 314.4(e)(3) and 314.4(e)(4)
MGMT-09	Previously MGMT-16
MGMT-10	Previously MGMT-17
MGMT-11	Previously MGMT-18
MGMT-12	Previously MGMT-19
MGMT-23	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-24	<ul style="list-style-type: none">• Change citation to 314.4(b)(1) and 314.4(c)(2)• Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-25	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-26	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-27	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-28	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-29	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-30	Asterisk added to note potential exemption from the FTC Safeguards Rule

MGMT-31	Asterisk added to note potential exemption from the FTC Safeguards Rule
MGMT-33	Change citation to 314.4(e)(1)
S&D-04	Change citation to 314.4(c)(1)
S&D-17	Existing question deleted. Details are now addressed in reworded Question 20. This question was replaced by S&D-94.
S&D-18	<ul style="list-style-type: none"> • Question updated to: Is detection and monitoring of system activity and security incidents performed internally under the direction of the Qualified Individual or externally by a third party? • Citation changed to 314.4(d)(1) and 314.4(d)(2) • Asterisk added to note potential exemption from the FTC Safeguards Rule
S&D-19	Existing question deleted. Details from the previous question 19 are addressed in reworded Question 18.
S&D-19	<ul style="list-style-type: none"> • Question updated to: Is system activity and information security event monitoring performed by the institution sufficient? Describe monitoring processes. Consider the following: ... • Citation changed to 314.4(d)(1) and 314.4(d)(2) • Asterisk added to note potential exemption from the FTC Safeguards Rule
S&D-20	Citation changed to 314.4(d)(1) and 314.4(d)(2) Asterisk added to note potential exemption from the FTC Safeguards Rule
S&D-21	Citation changed to 314.4(c)
S&D-22	Citation changed to 314.4(c)
S&D-25	Citation changed to 314.4(c)
S&D-26	Citation changed to 314.4(c)
S&D-27	Citation changed to 314.4(c)
S&D-28	Citation changed to 314.4(c)
S&D-29	Citation changed to 314.4(c)
S&D-30	Citation changed to 314.4(c)
S&D-31	Citation changed to 314.4(c)
S&D-32	Citation changed to 314.4(c)
S&D-45	Asterisk added to note potential exemption from the FTC Safeguards Rule
S&D-52	Citation changed to 314.4(c)(8)
S&D-56	Citation changed to 314.4(c)(1) AND 314.4(c)(2)
S&D-57	Citation changed to 314.4(c)
S&D-58	Citation changed to 314.4(c)(2)
S&D-59	Citation changed to 314.4(c)(2)
S&D-60	Citation changed to 314.4(c)(2)
S&D-62	Citation changed to 314.4(c)(1) and 314.4(c)(8)
S&D-63	Citation changed to 314.4(c)(1) and 314.4(c)(8)
S&D-64	Citation changed to 314.4(c)(1) and 314.4(c)(8)
S&D-65	Citation changed to 314.4(c)(1) and 314.4(c)(8)
S&D-92	<ul style="list-style-type: none"> • This question replaced Question 17. Citation changed to 314.4(d)(1) and 314.4(d)(2). • Asterisk added to note potential exemption from the FTC Safeguards Rule