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	 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	 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

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S&D-19 Existing or reworded S&D-19 • Q • C • A S&D-20 Citation or Asterisk and	Question updated to: Is detection and monitoring of system activity and ecurity incidents performed internally under the direction of the Qualified addividual 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
reworded	question deleted. Details from the previous question 19 are addressed in
S&D-20 Citation of Asterisk at S&D-21 Citation of S&D-22 Citation of S&D-25 Citation of S&D-26 Citation of S&D-28 Citation of S&D-29 Citation of S&D-30 Citation of S&D-31 Citation of S&D-32 Citation of S&D-32 Citation of S&D-32 Citation of S&D-52 Citation of S&D-52 Citation of S&D-56 Citation of S&D-58 Citation of S&D-59 Citation of S&D-60 Citation of S&D-60 Citation of S&D-62 Citation of S&D-63 Citation of S&D-64 Citation of S&D-64 Citation of S&D-65 Citation of S&D-65 Citation of S&D-65 Citation of S&D-64 Citation of S&D-65 Citation of S	d Question 18.
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3.	this question replaced Question 17. Citation changed to 314.4(d)(1) and 114.4(d)(2). Asterisk added to note potential exemption from the FTC Safeguards Rule