

# Baseline Nonbank Cybersecurity Exam Program – Release Notes

Released Date: 06/30/2023

Exam Program Version: Version 1.1

Release Details: A typo and two changes 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.

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)**.