

On June 30, 2016, the FDIC issued Financial Institution Letter (“FIL” or “Letter”) 43-2016, “Information Technology Risk Examination (InTREx) Program,” effective July 1, 2016.¹

The FDIC has made public statements about the pending release of this program since at least the beginning of this year. The purpose of the program is to assist examiners hone in on the specific examination needs of the bank to be examined. The bank will receive an “Information Technology Profile” questionnaire, which, according to the Letter, contains 65 percent fewer questions than the previously used “Officer’s Questionnaire”. The entire document is 66 pages and can found [here](#).

Of note, the document incorporates cybersecurity throughout the Information Technology Profile and, while it contains a separate section on cybersecurity, the section is meant as a summary of the findings throughout the document.

Also of note, the FDIC recognizes ICBA’s position on cybersecurity frameworks, tools and assessments in stating that the FFIEC Cybersecurity Assessment Tool (CAT) is one tool banks can use but it is not the only tool and examiners should recognize this fact:

The FFIEC Cybersecurity Assessment Tool (CAT) is one possible tool that institutions can use in assessing their cybersecurity preparedness. The content of the tool is consistent with the principles of the FFIEC Information Technology Examination Handbook (IT Handbook) and the NIST Cybersecurity Framework, as well as industry accepted cybersecurity practices. However, institutions are not required to use the CAT, and examiners should not criticize management if management chooses to use other appropriate tools, frameworks, or processes to assess a financial institution’s cyber risks and cybersecurity preparedness. Appendix A of FIL-28-2015 Cybersecurity Assessment Tool maps the baseline declarative statements to existing guidance in the FFIEC IT Examination Handbook. Examiners should reference this guidance, not the CAT, when citing cybersecurity deficiencies in examination comments.²

The next phase of the process will begin 45 days prior to the examination when institutions will be provided with an “IT Request Letter” which will reflect the institution’s IT profile and will request certain documentation. These items will be used by the examiners during the examination and in completing the InTREx Core Modules and other workpapers. Finally, the examination report will be presented which will include the already-familiar URSIT composite rating. According to the FDIC, “the results will be embedded in the Risk Management Report of Examination.”³

¹ <https://www.fdic.gov/news/news/financial/2016/fil16043.pdf>
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² See page 56 of the pdf or page 1 of the Cybersecurity Workpaper at <https://www.fdic.gov/news/news/financial/2016/fil16043a.pdf>

³ <https://www.fdic.gov/news/news/financial/2016/fil16043.pdf>