



## Preparing for the FDIC's Information Technology Risk Examination (InTREx) Program

April 11, 2017

## Before we get started...

- Today's presentation slides can be downloaded at [www.wolfandco.com/webinars/2017](http://www.wolfandco.com/webinars/2017).
- The session will last about 45 minutes, and we'll then have time for Q & A.
- Our audience will be muted during the session.
- Please send your questions in using the "Questions Box" located on the webinar's control panel.

# About Wolf & Company, P.C.

- Established in 1911
- Offers Audit, Tax, and Risk Management services
- Offices located in:
  - Boston, Massachusetts
  - Springfield, Massachusetts
  - Albany, NY
  - Livingston, NJ
- Over 200 professionals



*As a leading regional firm founded in 1911, we provide our clients with specialized industry expertise and responsive service.*

# Financial Institution Expertise

- Over 45 Risk Management Professionals:
  - IT Assurance Services Group
  - Internal Audit Services Group
  - Regulatory Compliance Services Group
  - WolfPAC® Solutions Group
- Provide services to over 300 financial institutions:
  - Approximately 85 FIs with assets > \$1B
  - Approximately 40 publicly traded FIs
  - Constant regulatory review of our deliverables
- Provide Risk Management Services in 27 states and 2 U.S. territories



# Meet Today's Presenter

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# Today's Agenda

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- InTREx Background
- InTREx Structure
- Real-World Implications
- Q&A

# What is InTREx?

- **I**nformation **T**echnology **R**isk **E**xamination Program
- FIL-43-2016 replaces FIL-81-2005
- Risk-based approach for FDIC IT Examinations
  - IT Risks
  - Cybersecurity Risks
- Ratings for each control and each Component

- FFIEC IT Examination Handbook
- Interagency Policy Statements
- Interagency Guidelines
- Financial Institution Letters
- Supervision and Regulation Letters



# Timeline

- FDIC published the FIL on June 30, 2016
- Program was implemented July 1, 2016
- To receive FILs electronically, please visit <https://www.fdic.gov/about/subscriptions/fil.html>

# InTREx Structure

- Core Modules
  - Audit
  - Management
  - Development and Acquisition
  - Support and Delivery



- Preliminary Review
- Key Take Aways
- Cybersecurity Controls



- Preliminary Review
- Key Take Aways
- GLBA Controls
- Cybersecurity Controls



# Development & Acquisition

- Preliminary Review
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# Support and Delivery

- Preliminary Review
- Key Take Aways
- GLBA Controls
- Cybersecurity Controls



- **Supplementation Work Programs**
  - E-Banking
  - Mobile Banking
  - Remote Deposit Capture



# InTREx Structure



- Information Security Standards Work Paper



- Cybersecurity Work Paper



# Expanded Analysis - Management

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- Cloud Computing
- Third-Party Service Provider User Groups
- Critical TSP Oversight
- MSSP
- Foreign TSP
- Incentive Compensation Agreements

# Expanded Analysis – Support and Delivery

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- Wireless Networks
- Virtualization
- Voice Over IP (VoIP)
- ATM Operations
- Customer-facing Call Centers
- IT Help Desk Operations

- Exam Logistics
  - Pre-Exam Field Work
  - Exam Field Work

- New Information Technology Profile (ITP) Questionnaire
  - 65% Fewer Questions (26 in total)

# Exam Logistics – Field Work

- Core Modules
- Face Time with Examiner
- Expanded Procedures and Supplemental Work Programs

- Hot-Button Issues
  - Asset Management
  - Patch Management
  - Vulnerability Management
  - IT Governance

- Beyond having the process
- Defending “Why” decisions were made
- “Who” provides the oversight

- Everything in your environment
- IoT
- End of Life Tracking



- Driven by Asset Inventory
- Full scope documentation
- True PROCESS

- Annual Scans no longer sufficient
- Tie in to Asset and Patch Management Processes

- Prior Exam/Audit Findings
- Information Security Program Oversight
- IT Risk Assessment Testing
- Vendor Management

# Key Take Aways

- **Very** mature process
- Comprehensive Asset Management
- Making Patch Management a true process
- Ongoing Vulnerability Management
- Formal Governance over each aspect



Thank you!

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