FDIC Advisory Committee on Community Banking

November 3, 2021

Information Technology Supervision Update



Cybersecurity – FinCEN Ransomware Report

This report is issued pursuant to Section 6206 of the Anti-Money Laundering Act of 2020 which requires the Financial Crimes **Enforcement Network to** periodically publish threat pattern and trend information derived from financial institutions' Suspicious Activity Reports.





Cybersecurity - FFIEC Authentication Guidance Update

- Scope:
 - business & consumer customers
 - employees
 - 3rd parties people & computers
- "... malicious activity resulting in compromise of customer and user accounts and information system security has shown that single-factor authentication, either alone or in combination with layered security, is inadequate in many situations."

Federal Financial Institutions Examination Council



3501 Fairfax Drive + Room B7081a + Arlington, VA 22226-3550 + (703) 516-5588 + FAX (703) 562-6446 + www.ffiec.gov

Authentication and Access to Financial Institution Services and Systems

Introduction

The Federal Financial Institutions Examination Council (FFIEC) on behalf of its members is issuing this guidance titled Authentication and Access to Financial Institution Services and Systems (the Guidance) to provide financial institutions with examples of effective risk management principles and practices for access and authentication. These principles and practices address business and consumer customers, employees, and third parties that access digital banking services²² and financial institution information systems.

The Guidance replaces the FFIEC-issued Authentication in an Internet Banking Environment (2005) and the Supplement to Authentication in an Internet Banking Environment (2011), which provided risk management practices for financial institutions offering Internet-based products and services. This Guidance acknowledges significant risks associated with the cybersecurity threat landscape that reinforce the need for financial institutions to effectively authenticate users and customers³ to protect information systems, accounts, and data. The Guidance also recognizes that authentication considerations have extended beyond customers and include employees, third parties, and system-to-system communications.

This Guidance highlights risk management practices that support oversight of identification, authentication, and access solutions as part of an institution's information security program. Periodic risk assessments inform financial institution management's decisions about authentication solutions and other controls that are deployed to mitigate identified risks. When a risk assessment indicates that single-factor authentication with layered security is inadequate, multi-factor authentication (MFA) or controls of equivalent strength, combined with other layered security controls, can more effectively mitigate risks associated with authentication.

Financial institutions are subject to various safety and soundness standards, such as the standard to have internal controls and information systems that are appropriate to the institution's size and complexity and the nature, scope, and risk of its activities. Applying the principles and

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¹ The Council has six voting members: a member of the Board of Governors of the Federal Reserve System, the Chairman of the Federal Deposit Insurance Corporation; the Chairman of the National Credit Union Administration; the Comptroller of the Currency of the Office of the Comptroller of the Currency; the Director of the Consumer Financial Protection Bureau; and the Chairman of the State Liaison Committee.

² Digital banking refers to any banking service or platform that utilizes Internet or mobile cellular network communications for providing customers with banking services or transactions.

³ For purposes of this Guidance only, the terms "users" and "customers" are defined in section 1 of this Guidance.
⁴ See, for example, Interagency Guidelines Establishing Standards for Safety and Soundness: 12 CFR 30, Appendix A, II(A) (OCC); 12 CFR 208, Appendix D-1, II(A) (FRB); and 12 CFR 364, Appendix A, II(A) (FDIC). See also 12 CFR 8 741 3 (NCIIA)

Cybersecurity - Computer Security Incident Notification

Major Themes From the Comments

- Focus on critical computer-security problems – avoid insignificant matters
- Simplify reporting to banks and to regulators
- Banks and service providers may need more time to determine that notification is required
- Existing contracts typically contain notification requirements
- Statutes and regulations require notification to regulators (e.g., SARs, GLBA)



Published December 18, 2020

