CYBER RISK INSTITUTE

November 6, 2020

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Federal Reserve Board of Governors
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Ms. Jelena McWilliams
Chairman
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Mr. Brian P. Brooks
Comptroller of the Currency (Acting)
Office of the Comptroller of the Currency
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Vice Chair Quarles, Chairman McWilliams, and Acting Comptroller Brooks,

On October 30, 2020, your agencies released a detailed report on "Sound Practices to Strengthen Operational Resilience" to help large banks increase operational resilience in the face of risks such as cyberattacks, natural disasters, and pandemics. Though this document does not constitute new regulation, it nonetheless is a foundational step in the ongoing evolution of how risk and resilience are considered and addressed in the financial services industry.

As you may be aware, the Financial Services Sector Coordinating Council (FSSCC) released the FSSCC Cybersecurity Profile ("the Profile") on October 25, 2018. At the time of its publication, the Profile reflected the arduous work of a coalition of financial institutions – a group energized to identify areas of regulatory topical commonality and overlap and build a way to improve confidence in compliance among the industry. The resulting Profile is a tool which supports cross-industry comparison and oversight, while easing the process of measuring compliance. In the two years since its release, the Cyber Risk Institute (CRI) was organized to house and maintain the Profile. The coalition of industry leaders which worked hard to develop the Profile now serve as CRI's member leaders, and they have continued to refine and expand the Profile through integrating new regulatory issuances and educating the industry on its use.

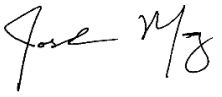
We are grateful that in your agencies' thoughtful analysis of "practices to increase operational resilience that are drawn from existing regulations, guidance, statements, and common industry standards" you include the Profile as a "standardized tools that [is] aligned with common industry standards and best practices." Indeed, the overall structure of your document echoes the Profile's NIST-based design – intended to marry regulatory requirements with a common cyber taxonomy and leading cyber practices. This is an effective approach, and provides value both to the industry, to regulators, and to the consumer.

We write to express our thanks for your recognition of the Profile, and to report that just as the release of your Sound Practices marks a never-ending effort to strengthen the security, safety and soundness of the financial services industry, so too are *we* committed to making continued improvements to the Profile as a means to support compliance. Toward that end, on November 12, 2020, the Cyber Risk Institute (CRI) will release Version 1.1 of the Profile, which is a critical next-step in the Profile's evolution. This new Version 1.1 incorporates Exhibit C of the National Association of Insurance Commissioners' (NAIC) Financial Condition Examiners Handbook (sometimes referred to as the NAIC IT Handbook). Additionally, Profile v1.1 now includes a full suite of "Informative References" for the Functions "Governance" and "Supply Chain/Dependency Management," better connecting those functions and related diagnostics to widely used industry standards such as ISO, COBIT, and NIST 800-53.

The release of these Sound Practices will benefit the industry – and we are glad to be included. Going forward, we are eager to work with you to ensure the Profile also evolves in a way which continues to increase the industry's cybersecurity posture and resilience as well as support compliance efforts and ease oversight by regulators. The Profile's approach, mirrored here in your report, is a durable, flexible way to evolve to meet the regulatory landscape. Going forward, we are committed to ensuring that Version 1.1 and all subsequent versions of the Profile continue to match the characterization included in your report.

Please reach out with any and all questions.

Sincerely,



Josh Magri
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The Cyber Risk Institute