



The CRI Profile (Profile), v2.0 - Impact Tiering Questionnaire -

Through 9 questions related to a financial institution's inherent risk and systemic risk, this Impact Tiering Questionnaire helps financial institutions discern its Impact Tier utilizing a four-tier model. Each of the four Impact Tiers are associated with a set of corresponding Diagnostic Statement questions. This Impact Tiering Questionnaire and the companion Excel Spreadsheet constitute the CRI Profile (Profile). To complete the below 9 questions, it should take only 5-10 minutes.

Please keep the following in mind when completing this Questionnaire:

1. Each numerically increasing tier from Tier 1: National/Super-National Impact to Tier 4: Localized Impact represents a step down in maturity expectations.
2. Institutions aligning to the highest impact tier – Tier 1: National/Super-National Impact – will be immediately “off-ramped” and will need to address every Diagnostic Statement. Other institutions will have to answer more up-front questions via the Questionnaire, but would then need to complete fewer Diagnostic Statements:
 - a. Institutions that self-assess at the Tier 1: National/Super-National Impact Tier would answer 1-2 Impact Questionnaire questions and then 318 corresponding Diagnostic Statement questions for a total of 319-320 responses.
 - b. Institutions that self-assess at the Tier 2: Subnational Impact Tier would answer 3-6 Impact Questionnaire questions and then 311 corresponding Diagnostic Statement questions for a total of 314-317 responses.
 - c. Institutions that self-assess at the Tier 3: Sector Impact Tier would answer 7-9 Impact Questionnaire questions and then 282 corresponding Diagnostic Statement questions for a total of 289-291 responses.
 - d. Institutions that self-assess at the Tier 4: Localized Impact Tier would answer all 9 Impact Questionnaire questions and then 208 Diagnostic Statement questions for a total of 217 responses.
3. If in doubt when responding to a question, institutions should always select a response that would lead to correlation with a higher Impact Tier (which is a numerically lower number).
4. Institutions should consider institution-specific risk factors that may warrant elevating the institution to a higher tier than indicated by the Questionnaire, or adopting additional Diagnostic Statements than may be indicated for the tier indicated by the Questionnaire.

*** This work is licensed under the Creative Commons Attribution-NonCommercial-NoDerivatives 4.0 International License.** To view a copy of this license, visit <http://creativecommons.org/licenses/by-nc-nd/4.0/> or send a letter to Creative Commons, PO Box 1866, Mountain View, CA 94042, USA.

Tier 1: National/Super-National Impact

Question 1.1 Overview: Numerous countries and multinational bodies (e.g., Basel) have designated various Financial Services Sector institutions as critical and systemically important by way of different designations. These designations imply a high level of systemic importance and therefore result in the alignment of designated institutions to the highest impact tier: **Tier 1: National/Super-National Impact**.

Question 1.1:	Check the Box(es) that apply: Is your institution designated as systemically important to the Financial Services Sector under one of the following designations? ☐ a. Critical infrastructure institution as defined by one or more nations in which it operates. ☐ b. Global Systemically Important Bank (G-SIB)¹ ☐ c. Domestic Systemically Important Banks (D-SIB)² or Non-Bank Systemically Important Financial Institutions (N-SIFI) ☐ d. Designated Financial Markets Utility (e.g., SIFMU's, D-FMUs) ☐ e. Data processing establishments as defined by the local market (e.g., MDPS, MRIO)
----------------------	---

If No to all: Proceed to **Question 1.2**.

If Yes to any: Your institution is designated a **Tier 1: National/Super-National Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 1: National/SuperNational Impact** Diagnostic Statements.

Question 1.2:	Does your institution consistently participate in (e.g., hold, clear, settle, or transact) at least five percent of the value of transactions in a critical market³ within a national economy? Check all that apply. ☐ a. Reserve Balances ☐ b. Foreign Exchange ☐ c. Commercial Paper ☐ d. Government Securities ☐ e. Government-Sponsored Agency Securities ☐ f. Corporate Debt ☐ g. Corporate Equity Securities ☐ h. Derivatives
----------------------	--

If No to all: Proceed to **Tier 2: Sub-National Impact** and its questions.

If Yes to any: Your institution is designated a **Tier 1: National/Super-National Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 1: National/Super-National Impact** Diagnostic Statements.

¹ As applied at a national level, it is assumed that the designated institution is a domestically chartered institution.

² Same as FN 1.

³ The identification of critical markets and the five percent figure originated from the Federal Reserve Board, Office of the Comptroller of the Currency and the Securities and Exchange Commission's jointly issued "Interagency Paper on Sound Practices to Strengthen the Resilience of the U.S. Financial System," released in April 2003.

Tier 2: Sub-National Impact

Question 2.0 Overview: The Financial Services Sector is characterized by a high degree of interconnectedness with certain institutions acting as key nodes within a complex network. The nature of services which institutions provide to others in the sector play a significant role in determining the institution's criticality. Specifically, those providing services critical to another institution's operations represent a significant level of inherent risk, and thus, align to the second highest impact tier:

Question 2.1:	Does your institution provide a product or service to businesses in other industries or to other institutions in the Financial Services Sector for which the compromise of your product's or service's confidentiality, integrity or availability is reasonably likely to cause one or more of the following impacts? ☐ a. Failure of your institution's ability to meet its payment or settlement obligations, which could trigger a market disruption where other financial institutions might not be able to meet their settlement obligations (e.g., materially constraining business customers' ability to maintain adequate liquidity). ☐ b. Failure or severe or prolonged disruption of a core payment and settlement system, which can be compromised at various endpoints, affecting multiple country and locations' securities markets. ☐ c. The loss or compromise of the availability and integrity of key financial data critical to the delivery of a product or service at other institutions. ☐ d. Widespread loss of trust and confidence in the payment and settlement systems.
----------------------	--

If No to all: Proceed

If Yes to any: Your institution is designated a **Tier 2: Sub-National Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 2: Sub-National Impact** Diagnostic Statements.

Questions 2.2.A and 2.2.B Overview: *Geographical and Geopolitical Considerations* – Certain geographical and geopolitical factors increase the risk profile for financial services institutions. Institutions wholly or partially owned by entities located within high risk countries are exposed to geopolitical factors (e.g., instability) which raise their risk profile. Also, institutions housing IT facilities in these areas are exposed to similar risk factors which elevate their risk profile.

Countries of particular interest for questions 2.2.A and 2.2.B:

<https://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

Question 2.2.A:	Is your institution owned or partially owned by a foreign held entity located in a country of particular interest (check via link above)? ☐ No ☐ Yes
Question 2.2.B:	Does your institution have facilities located within a country of particular interest (check via link above) that allow access to your network infrastructure from that facility? ☐ No ☐ Yes

If No to both Questions 2.2.A and 2.2.B: Proceed to the *Customer and Consumer Impact* set of questions, starting at Question 2.3.

If Yes to either Question 2.2.A or 2.2.B: Your institution is designated a **Tier 2: Sub-National Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 2: Sub-National Impact** Diagnostic Statements.

Question 2.3 Overview: *Customer and Consumer Impact* – An institution's capacity to experience a cyber event that would have a potential to cause harm to customers and consumers plays a key role in determining a given institution's importance to the Financial Services Sector. **For the purposes of this question, customers and consumers include individual customers and business customers.**

Question 2.3	Does the number of individuals whose data your institution processes exceed 5 million or 2% of the country's population which your institution operates business in, whichever is lower? ☐ No ☐ Yes
---------------------	--

If No to Questions 2.3: Proceed to **Tier 3: Sector Impact** and its questions.

If Yes to Question 2.3: Your institution is designated a **Tier 2: Sub-National Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 2: Sub-National Impact** Diagnostic Statements.

Tier 3: Sector Impact

Question 3.1 Overview: The Financial Services Sector is characterized by a high degree of interconnectedness with certain institutions acting as key nodes within and for the sector. The nature of services that these institutions provide to others in the sector plays a moderate role in determining the institutions' criticality. This section specifically seeks out such institutions.

Question 3.1:	Does your institution provide a product or service to other institutions within the Financial Services Sector for which the compromise of your product's or service's confidentiality, integrity, or availability is reasonably likely to cause one or more of the following impacts? ☐ a. Complete unavailability of your institution's product or service would noticeably diminish the efficacy and effectiveness of your primary functions but would NOT impact your institution's ability to perform them (e.g., adversely impacting business customers' ability to maintain liquidity.) ☐ b. Your product or service collects/distributes data that may noticeably compromise another institution's ability to deliver a product or service but would NOT completely eliminate such ability. ☐ c. Significant impact on Financial Services Sector trust and confidence or delivery of critical Financial Services rather than to settlement/payment.
----------------------	--

If No to all: Proceed to the Customer and Consumer Impact set of questions, starting with Question 3.2.A

If Yes to any: Your institution is designated a **Tier 3: Sector Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 3: Sector Impact** Diagnostic Statements.

Questions 3.2.A and 3.2.B: Customer and Consumer Impact – An institution's capacity to experience a cyber event that would have a potential to cause harm to customers and consumers plays a key role in determining a given institution's impact to the Financial Services Sector. ***For the purposes of this question, customers and consumers include individual customers and business customers.***

Question 3.2.A	Do you provide products or services to financial institutions that involve customer data processing or storage? ☐ No ☐ Yes
-----------------------	--

If No: Proceed to **Question 3.2.B**.

If Yes: Your institution is designated a **Tier 3: Sector Impact**.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 3: Sector Impact** Diagnostic Statements.

Question 3.2.B

Does your institution process data for **1 million individuals (up to 5 million) or 1% (up to 2%) of the country's population** which your institution operates business in, whichever is lower?

- ☐ No
☐ Yes

If No to Question 3.2.B: Proceed to Tier 4: Localized Impact.

If Yes to Question 3.2.B: Your institution is designated a Tier 3: Sector Impact.

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 3: Sector Impact** Diagnostic Statements.

Tier 4: Localized Impact

There are NO Questions that an institution has to answer for Tier 4: Localized Impact. If your institution answers the questions that pertain to Tier 1: National/Super-National; Tier 2: Sub-National; and Tier 3: Sector; and none of those tiers apply, then your institution is designated a **Tier 4: Localized Impact**.

Institutions at this tier have a limited impact on the Financial Services Sector. If in doubt, institutions should **always** adopt the higher impact tier (which is a numerically lower number) and associated baseline Diagnostic Statements.

Typical characteristics of institutions designated Tier 4: Localized Impact include:

- Institutions that process data for **less than 1 millions individuals or less than 1% of the country's population which your institution operates business in**, whichever is lower
- Institutions with a localized presence (e.g., community banks, state banks)
- Providers of services which **do not** rise to the level of impact to the ability of other institutions to provide services that would warrant higher tier designations

Tier 4: Localized – Discussion:

Next Steps: Refer to the separately attached Excel Spreadsheet and the corresponding **Tier 4: Localized Impact** Diagnostic Statements.