

Compliance Checklist

ABOUT

The items on this checklist provide recommendations for preparing to comply with the “Computer-Security Incident Notification Requirements for Banking Organizations and Their Bank Service Providers.” Work with your compliance and legal advisors to ensure the requirements of the rule are sufficiently addressed for your bank. [Learn more about the rule.](#)

BANK TO REGULATOR

The following items help you prepare to report a notification incident to your primary federal regulator.

- ☐ **Identify your regulator contact.**
To prepare for a notification incident, determine:
 - Who the regulator wants you to contact.
 - How you should contact them.
- ☐ **Update your incident response plan.**
Ensure the plan addresses:
 - Determining when an incident is a “notification incident.”
 - Who is responsible for contacting your regulator.
 - When, how, and what communication will take place.
- ☐ **Review your incident management policy.**
Ensure your incident management policy addresses communicating with applicable parties.
- ☐ **Train your incident response team.**
Ensure individuals who respond to incidents are familiar with the requirements, the modifications to your plan, and their role in implementing it.

SERVICE PROVIDER TO BANK

The following items help you prepare to receive reports of a bank service provider incident.

- ☐ **Identify your bank service providers.**
These are a specific, and often critical, subset of your third-party service providers. [Learn more.](#)
- ☐ **Review your existing contracts.**
Determine if agreements with bank service providers:
 - Require notification of an incident ASAP.
 - Define designated points-of-contact.If not, determine if an addendum or revision is needed.
- ☐ **Review your vendor management program.**
Ensure the program requires future contracts with bank service providers to comply with the requirements.
- ☐ **Train your designated contacts.**
Ensure the individuals who may receive the notification (e.g., vendor managers, CEO, CIO, etc.) know what to do with it.

AFTER AN INCIDENT

- ☐ **Document communications.**
If you notify your regulator or receive notification from a service provider, make a note about the communication in your incident tracking system.
- ☐ **Provide feedback.**
If you have feedback about the rule, you can submit it to [your regulator](#) or to the [Office of Management & Budget](#).