Information Security Examination Program (ISE) User Guide

1. INFORMATION SECURITY EXAMINATION (ISE) PROGRAM

The ISE assessment module of NCUA's Toolbox offers three different examination levels outlined below:

Exam Type	Use Form	When to Use?
Small Credit Union Examination Program (SCUEP)	**SCUEP ISE**	**Credit unions with an asset size of $50 Million or below**
Risk-focused	**CORE ISE**	**Credit unions with an asset size above $50 Million**
Risk-focused	**CORE+ ISE**	**All risk-focused exams with optional additional reviews**

2. SYSTEM REQUIREMENTS

Local Installation
It is recommended that users meet the minimum system hardware and software requirements.
This includes:

- Pentium dual core 2.2 GHz processor (Intel x86 compatible)
- 6 GB free disk space
- 4 GB of RAM
- Microsoft Windows 10 or higher
- Microsoft .NET Core 7.x Runtime (included in CSET installation)
- SQL Server 2019 Express LocalDB (included in CSET installation)

3. TOOL DESIGN

The ISE tool has three primary components: the **profile**, **statements**, and **sub-statements**.

- The exam profile is the initial step in developing a capability to identify and collect information security and cybersecurity risk indicators.
- The profile covers activities, services, and products of the credit union.
- The statement is the high-level activity, process, or control. Each statement is comprised of one or more multi-numbered sub-statements and will require a yes or no response.
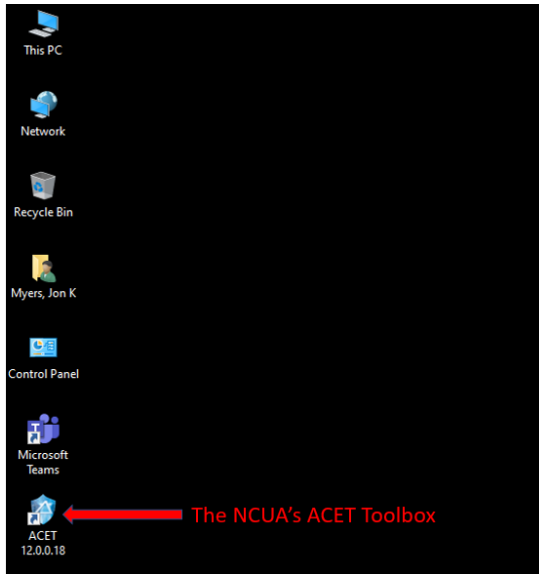
Each assessment is comprised of three parts:

- **Prepare**: this section contains the Demographics and Exam Profile components.
- **Assessment**: this section houses the Statements, sub-statements, and issues.
- **Results**: this section houses the reports.

4. COMPLETING AN ASSESSMENT

1. PREPARE

Begin an assessment by clicking on the ACET 12.0.0.18 Toolbox icon on your desktop.
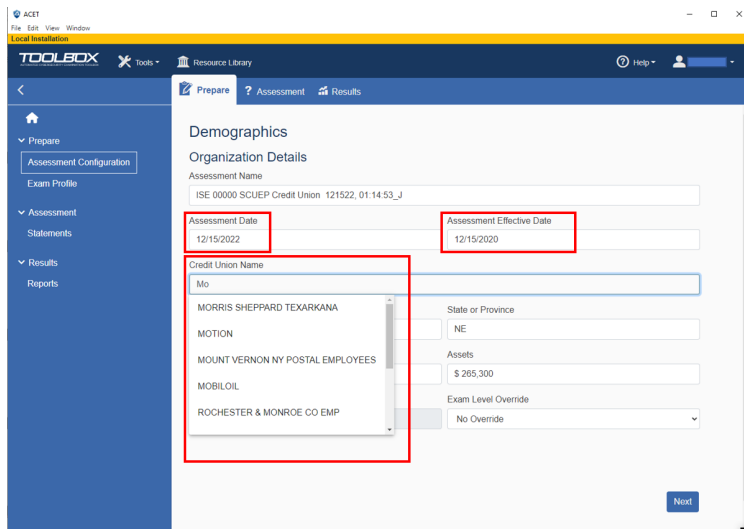

Once open you'll be at the My Assessments screen. Click the Start a New Assessment icon, navigate to the Information Security Examination (ISE) icon just below the National Credit Union Administration (NCUA); highlight the icon and click on the play button labeled create assessment.
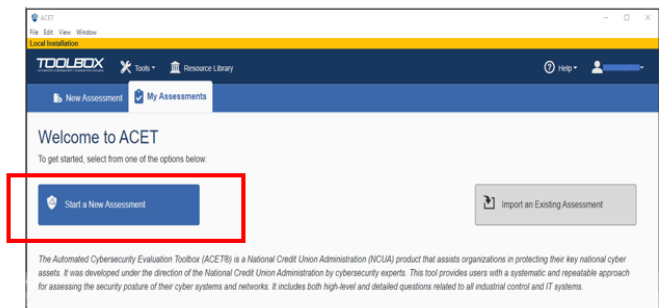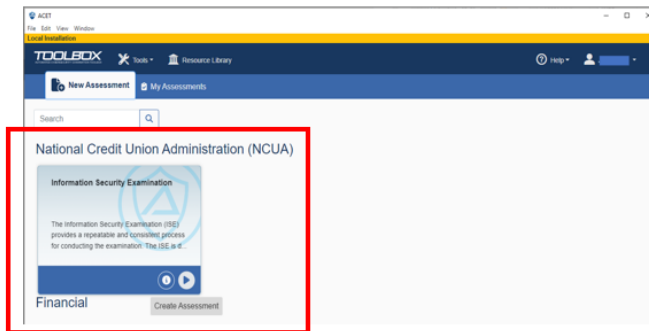
2. DEMOGRAPHICS

Once in Demographics, the Assessment Name is automatically populated based on the auto-complete function, while the current date will be placed into the Assessment Date and the Assessment Effective Date. You can change the Assessment Effective Date to whatever the Effective Date for the Examination may be; neither dates are fixed, and both can be adjusted.

Moving down to credit union name. The credit union name will auto-fill as you begin typing.   Matches will be displayed below if there are more than one and you can select the one you want. Once selected the City, State, and Charter will also auto-populate.

Although you can start with the name of a credit union, to ensure you have the correct credit union, it is recommended you begin at the Charter field and enter the charter number and it will then populate the credit union name, city, and state. Credit union names and charters will be updated on a semi-annual basis. If for any reason the charter and name are not matching, due to a name change or new charter that is not in the database, you can manually enter it.

Next, you'll need to fill-in the Assets field. This is the field which determines the exam level you'll be presented with to complete the assessment. Any credit union with an asset size of $50 million or below will be assigned a SCUEP examination, while an asset size above $50 million will result in a CORE.

The Exam Level Override is a feature specifically added to account for an instance where an examiner runs into a small credit union exhibiting an unusually high amount of risk warranting a deeper dive of the information security program. Once all fields are complete, click the NEXT button
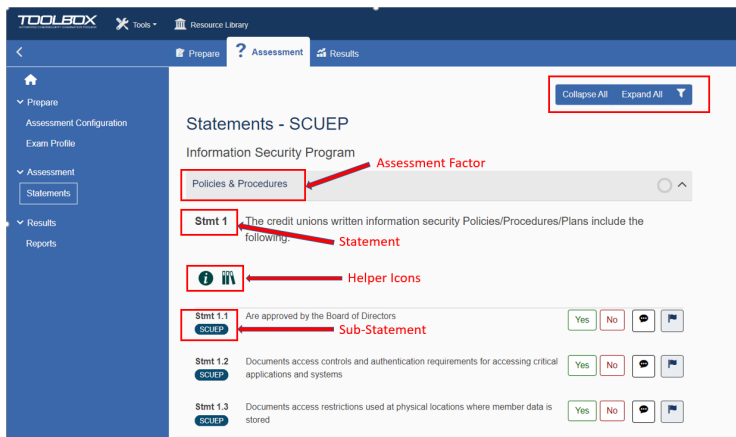
3. EXAM PROFILE

Exam Profile portion of the assessment houses 9 questions focusing on the activities, services, and products of the credit union. Answer these questions before proceeding. The responses in this section are unique to each credit union.   Complete this section and click Next.
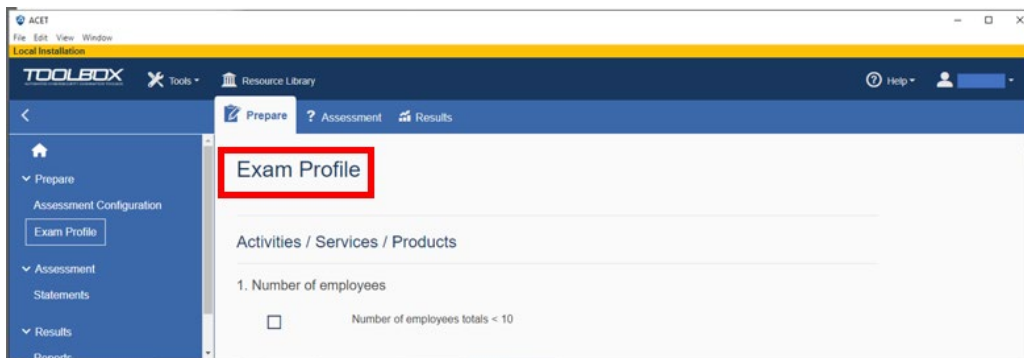
4. STATEMENTS

Statements are categorized into assessment factors. When completing the Statements, it's recommended to select use the Expand All button to display all Statements and sub-statements. Statements are broken into a top-level level numbered statement and subsequent numbered sub-statements. Under each sub-statement is the label for the exam-level.

Each sub-statement for each top-level statement requires a yes or no response. To the right of that are the chat bubble icons. This is an optional area which examiners can enter personal notes for themselves that will not be a part of the final examination report we include into MERIT; and to the right of that is a flag icon. If you want to flag any sub-statement for further review, click on it to highlight that sub-statement. The assessment factor will display the flag and let you know there are sub-statements in this section which requires further review.

Below each numbered top-level Statement we provide Helper Icons. The Supplemental Guidance icon represented by the "I" provides each examiner with additional information relative to the Statement. Supplemental Guidance also matches up with the items in the Document Request List provided in MERIT and lists those Items for Review for each statement.   To collapse Supplemental Guidance, simply click the icon again.

The second Helper Icon is labeled References. When clicked it will provide the regulatory citation associated with the Statement as well as References documents supporting the Statement.

To complete each Statement simply answer the sub-statements until you get to the end. Note as you answer each sub-statement, the open circle to the right of the Assessment Factor will begin to close. Once all statements are answered, the circle will complete and have a check mark in the middle.

5. ISSUES

For each No response to a sub-statement the system will auto-generate a sample issue with a title, risk area, sub risk area, description, the sub-statement marked no, action item, and regulatory citation. These fields coincide with those within MERIT. The Description and Action Items are editable. You can add more detail or delete it altogether and draft your own. Before you close any Issue once you open it, you must select an Issue Type. These also coincide within MERIT; so your choices are Examiner Finding, Document of Resolution, Supplemental Fact, or Non-reportable.

The text in RED signifies a higher level of risk may exist with these sub-statements answered in No, and you may want to consider formally addressing these. However, the issue type selected, regardless of the text color, are always up to the judgement of the examiner. In this case, we'll select Examiner Finding and click Done.

Optionally, an examiner may delete the entire sample Issue or click on the Add an Issue and create their own. If you add your own, the only areas pre-filled are Title, Risk, Sub-Risk and Regulatory Citation.

Below the Issues you'll find the Statement Summary; this is the section where the examiner documents the work performed for this Statement. Unlike the notes placed in the chat bubble, these comments will be included in the examination report for MERIT

Once all the sub-statements are complete, the circle icon has closed, and displays the check mark, you're ready to move onto the next Assessment factor. If you have not completed all sub-statements and you marked one or a few for further review that will be displayed as well. Once all Statements, Sub-Statements, and Issues (if any) are completed, click Next, to move onto Results.

Please note, you will be able to continue to the next screen if you do not complete all sub-statements and assigned an issue type to any Issues. The system will provide feedback as to which have not been completed when moving to Results. However, the examination reports needed for completing the Scope tasks in MERIT will not be generated.
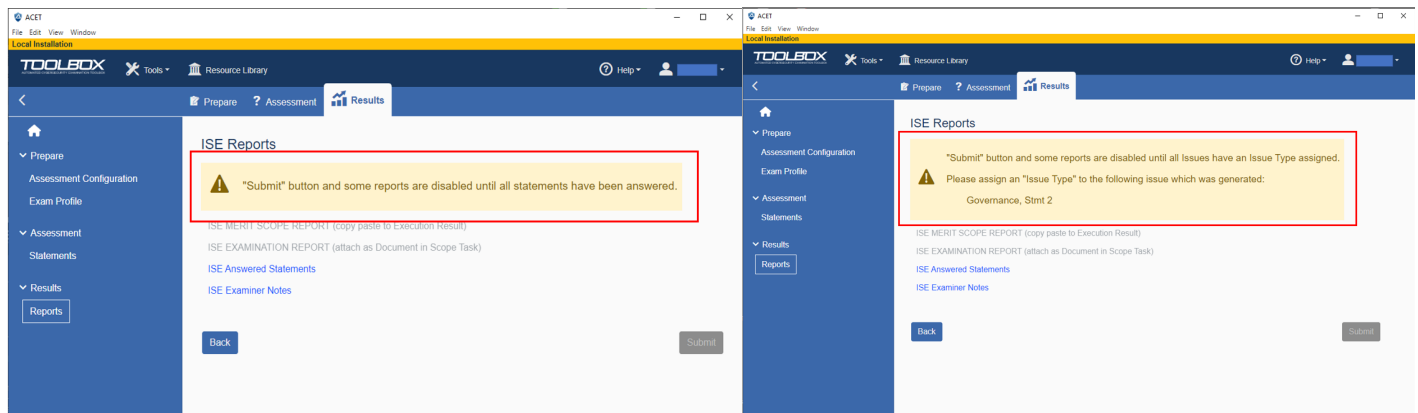
6. MERIT

Once the assessment section is complete, and you clicked Next, the tool takes you to the Results section of the assessment. The Results section provides the reports necessary to populate the results of this examination into the GLBA Scope Task within MERIT. The two reports needed to complete the GLBA Scope task for both SCUEP's and Risk-Focused Examinations are found in the following two reports:

1. ISE MERIT SCOPE REPORT
2. ISE EXAMINATION REPORT

ISE MERIT SCOPE TASK REPORT

From Results, click on the ISE MERIT SCOPE Report. The ISE MERIT SCOPE report consists of the following: Demographics, Instructions, **work performed**, **results of review** and **Issues**. Use the copy and paste features in the report to populate the worked performed, results of review, issues, and supplementary facts into the MERIT GLBA Scope Task.

To facilitate transferring information from the ISE MERIT Scope Report to MERIT, we have included a copy button. Click the Copy button, again use the CTRL+V keys to paste those results into MERIT. You can copy all items in a section at once by using the copy all button or copy them individually. This can be done for every relevant section that needs to be completed in MERIT.

ISE 00000 SCUEP Credit Union 121522, 09:41:11_J
15-Dec-2022

Demographics

Assessment Name:	ISE 00000 SCUEP Credit Union 121522, 09:41:11_J
Assessment Date:	15-Dec-2022
Credit Union:	SCUEP Credit Union
City or Site Name:	OMAHA
State, Province or Region:	NE
Charter:	00000
Assets:	$265,300.00
Exam Level:	SCUEP

Instructions

Copy/Paste the contents of ISE **Work Performed** below into the Execution Result, Work Performed section of the MERIT ISE Scope.

Copy/Paste the contents of **ISE Results of Review** below into the Execution Result, Results of Review portion of the MERIT ISE Scope.

Work Performed ⬛ ← **Copy button**

Completed the ISE work program

Results of Review ⬛ ← **Copy button**

Performed review of the security program using the ISE Toolbox.

1 DOR was drafted in the following category:
    Governance

1 Examiner Finding was drafted in the following category:
    Policies & Procedures

1 Supplemental Fact was drafted in the following category:
    Business Continuity / Disaster Recovery

1 Non-reportable was drafted in the following category:
    Training

Issues

Statement: Stmt 2

Title → **Title:** Information Security Program, Governance

Issue Type: DOR

Copy button → **Description:**

Governance of information security program is not commensurate to its size, complexity, and risk. Each credit union must identify and evaluate risks to its information, develop a plan to mitigate the risks, implement the plan, test the plan, and monitor the need to update the plan. An information security program is the written plan created and implemented by a credit union to identify and control risks to information and information systems and to properly dispose of information. The plan includes policies and procedures regarding the institution's risk assessment, controls, testing, service-provider oversight, periodic review and updating, and reporting to its board of directors.

Copy All button → ⬛ Copy All **Action Items:**

1: Review results from the information security risk assessment with the board of directors.

2: Develop necessary steps to ensure business arrangements with third party does not present unwarranted risks.

Risk Area: Transaction

Sub-Risk Area → **Sub-Risk Area:** Information Systems & Technology Controls

Regulatory Citation:

12 C.F.R. § 748.0 (b)(2)

Statement: Stmt 1

Title: Information Security Program, Policies & Procedures

Issue Type: Examiner Finding

Description:

The information security program policies and procedures are not commensurate to its size, complexity, and risk. Each credit union must identify and evaluate risks to its information, develop a plan to mitigate the risks, implement the plan, test the plan, and monitor the need to update the plan. An information security program is the written plan created and implemented by a credit union to identify and control risks to information and information systems and to properly dispose of information. The plan includes policies and procedures regarding the institution's risk assessment, controls, testing, service-provider oversight, periodic review and updating, and reporting to its board of directors.

⬛ Copy All **Action Items:**

2: Strengthen the security program policies to include critical access controls and authentication requirements.

3: Strengthen the security program by incorporating provisions into policy and procedures for restricting access to physical locations where member sensitive data is stored.

Risk Area: Transaction

Sub-Risk Area: Information Systems & Technology Controls

Regulatory Citation:

12 C.F.R. § 748.0 (b)(2)

**Please note when entering an Issue in MERIT…In action details, you will need to draft an action title, the report does not provide one for you.
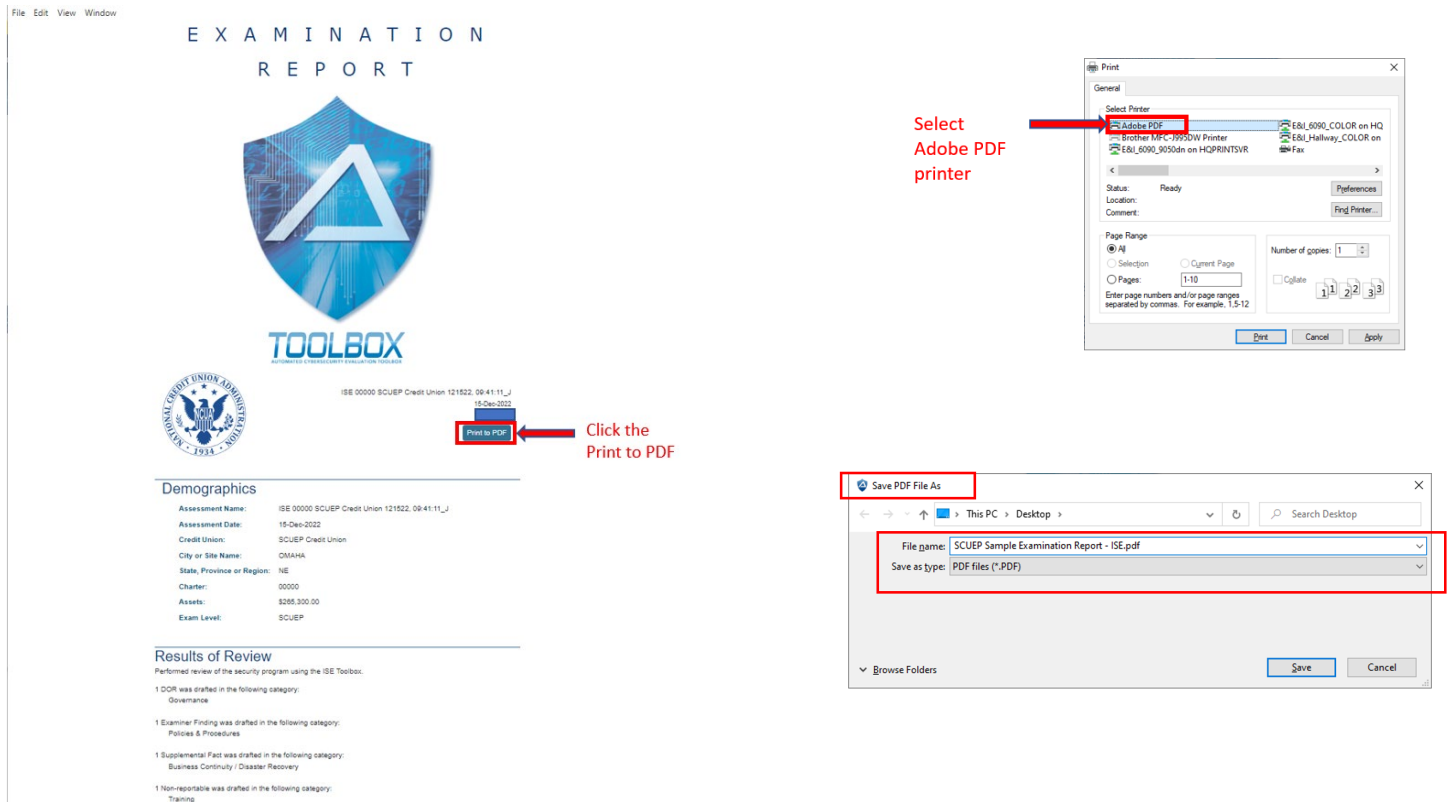
ISE Examination Report

The ISE Examination Report will need to be attached to the document section in the GLBA Scope Task in MERIT. This report contains demographics, results of review, statement overview, statement summary and issues.

To attach the ISE Examination Report to MERIT, first click on the PRINT PDF button, select the Adobe PDF printer, and click Print. When Prompted save the Examination Report with an appropriate name, you may use any naming convention you want. Also note where it is saved, the default location is usually your desktop, but you may save it wherever you want. Now close the PDF and report.

In the GLBA scope task in MERIT under the Documents section click add documents, complete the Title, select the supporting document category, and attach the Examination Report.
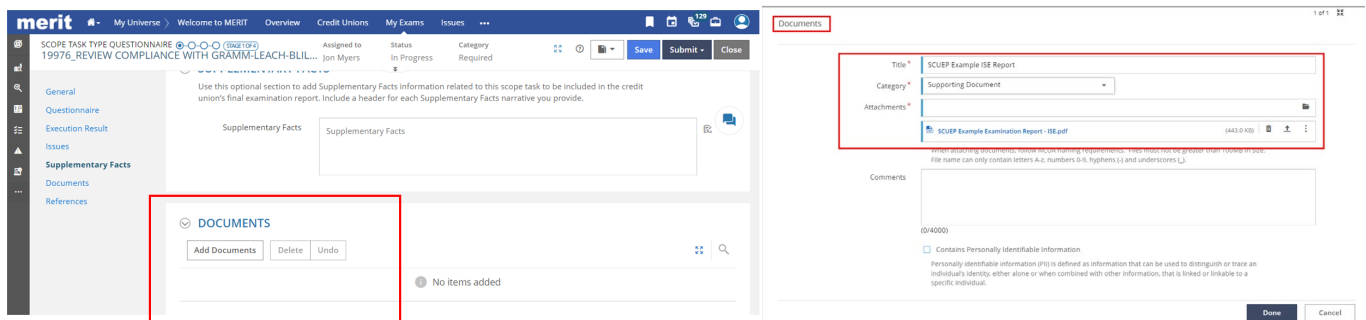
ISE Answered Statements

SCUEP:

When a SCUEP Exam Level assessment is selected (based upon the Proposed Exam Level in Demographics), all statements and sub-statements of the SCUEP assessment will be displayed, regardless of whether sub-statements have been answered Yes, No, or unanswered. For NCUA examiners conducting a joint exam, where the State Supervisory Authority does not use the ISE; this report may be useful in completing and documenting responses to specific Statements, when neither the SCUEP nor the CORE Statements will be completed. Please note; an incomplete set of SCUEP or CORE Statements will result in the inability to produce the ISE MERIT Scope and ISE Examination Report.

Answered Statements

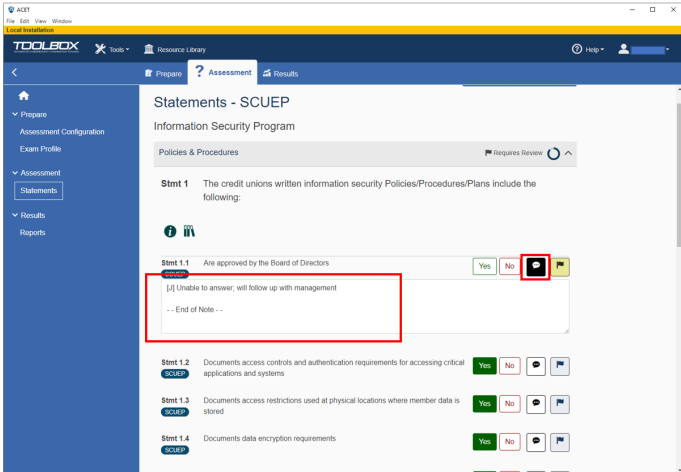This report includes all the statements within your exam level and your answers.

The statement set is determined by your exam level.

Answered Statements

Examination Statements	Answer	Exam Level
Information Security Program - Assessment Factor		
Policies & Procedures - Component		
Stmt 1 The credit unions written information security Policies/Procedures/Plans include the following:		SCUEP
Stmt 1.1 Are approved by the Board of Directors	Yes	SCUEP
Stmt 1.2 Documents access controls and authentication requirements for accessing critical applications and systems	No	SCUEP
Stmt 1.3 Documents access restrictions used at physical locations where member data is stored	No	SCUEP
Stmt 1.4 Documents data encryption requirements	Unanswered	SCUEP
Stmt 1.5 Documents when key or critical controls will be tested	Unanswered	SCUEP
Stmt 1.6 Documents segregation of duty requirements	Yes	SCUEP
Stmt 1.7 Documents outlining data destruction and media sanitization criteria	Yes	SCUEP
Stmt 1.8 Assigns specific responsibility for the security program's implementation	Yes	SCUEP
Governance - Component		

CORE:
When a CORE Exam Level assessment is selected (based upon the Proposed Exam Level in Demographics), all statements and sub-statements (answered or unanswered) of the CORE, as well as any answered statements from CORE+ will be displayed.

Answered Statements

This report includes all the statements within your exam level and your answers.

The statement set is determined by your exam level.

ISE Examiner Notes

This Report prints any notes the Examiner entered the "Notes with content" section of sub-statements. Any text entered these portions of the sub-statements are for the Examiner only and will not be reflected in the report uploaded into MERIT.

7. Submitting your ISE Assessment

Every examiner must SUBMIT the results of the Assessments upon completion. Once the Examination is complete, and all sub-statements and Issues have been finalized, every examiners must SUBMIT the results to the central repository. This is accomplished through the SUBMIT button in the Results, ISE Report section of the assessment. To submit the results of the assessment, simply navigate to the Results section and click on the SUBMIT button.

Upon submission a confirmation to notify the Examiner the information has been successfully saved. If you encounter any message other than the "**Submission Success**" message, please contact Jon Myers or Christina Saari at the E&I, Critical Infrastructure Division.
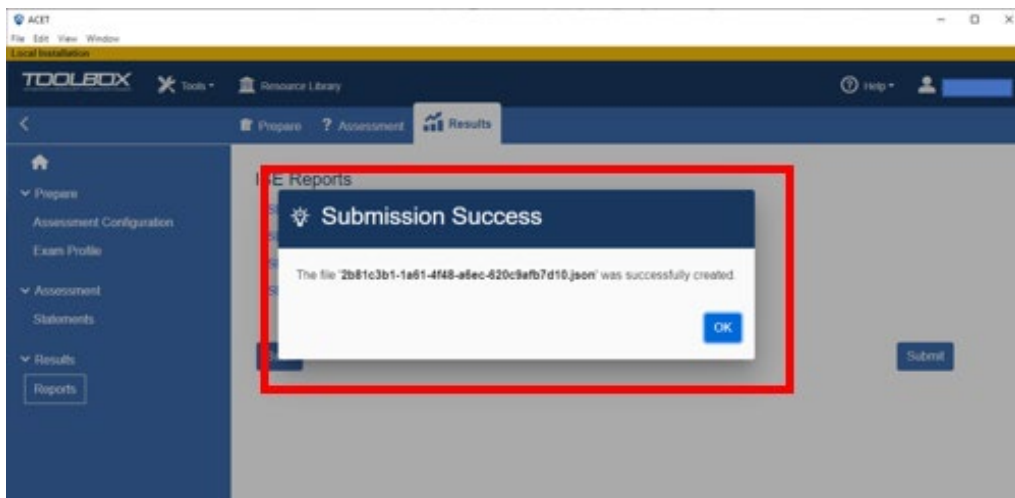

8. MERGE Utility

The Merge function can be used when multiple examiners participate on an ISE. The toolbox will combine the responses to create a single assessment to upload into MERIT.

The examiner conducting the merge will need to receive an export file. To export an assessment, navigate to My Assessments and click the Export button of the assessment you would like to send to the person

performing the Merge, and save the exported file. The Export file will automatically default the save location to the downloads folder. Provide this file to the examiner consolidating the reports.

For the person conducting the merge, the file you received from the examiner will need to be imported into their My Assessments repository. To import the file, click the import button under my assessments, locate the exported file provided, select the file, and click open. The report will be available in My Assessments with the initial of the examiner who provided the file.
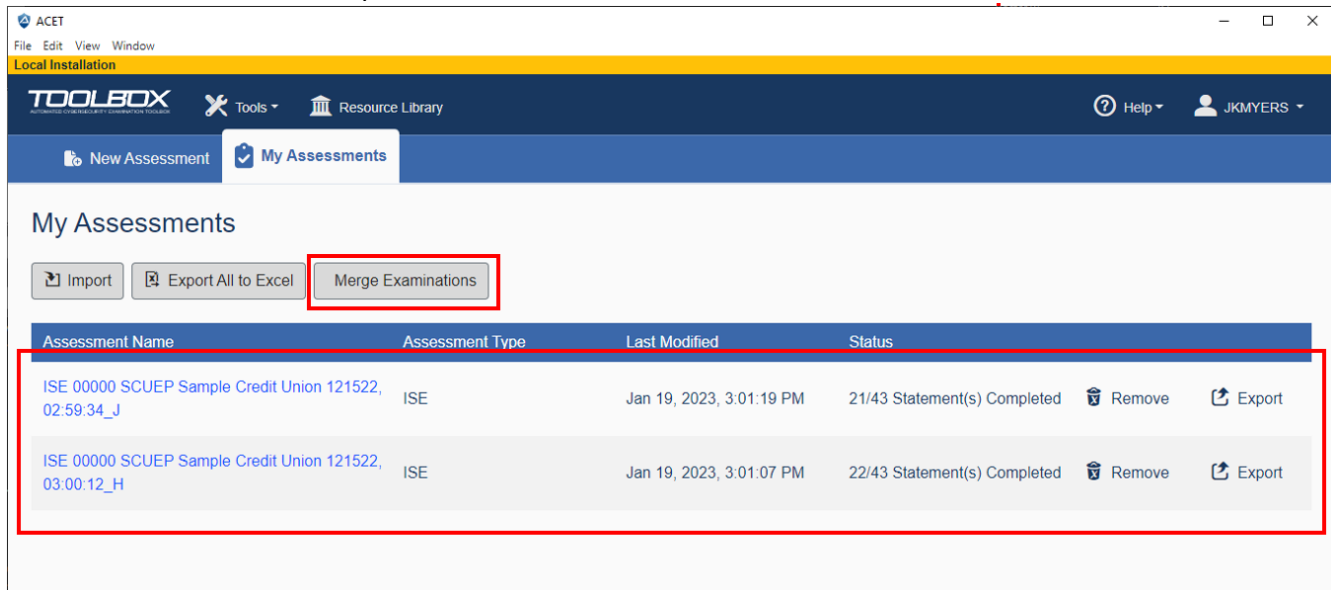

To perform the merge, click the merge examination, click the merge boxes of the examinations you want merged. Click the start merge. If there are no conflicts, you will receive a pop-up indicating that there are no conflicts. Click the "click here" to proceed with the merge. The result will be an additional examination in my assessments labeled Merged with the charter number and the date. It will state it is a blank assessment until you open the examination. Go back to my assessments and the merge examination will show as completed.
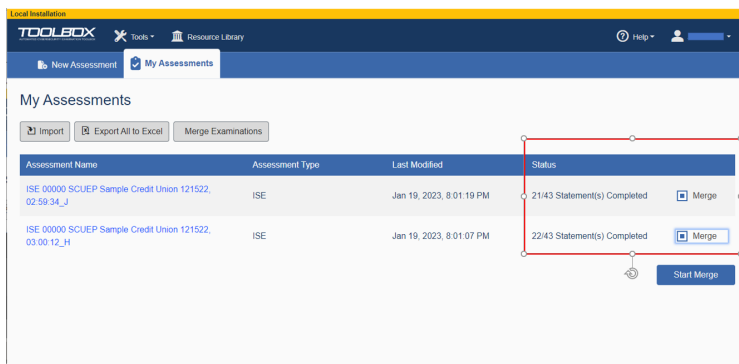
If there are no conflicts, you will receive a pop-up indicating that there are no conflicts. Click the "click here" to proceed with the merge.
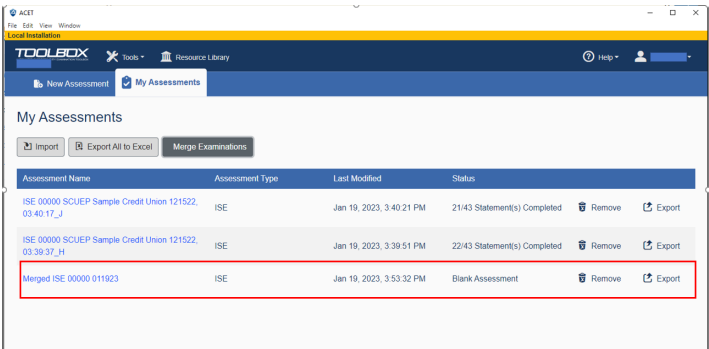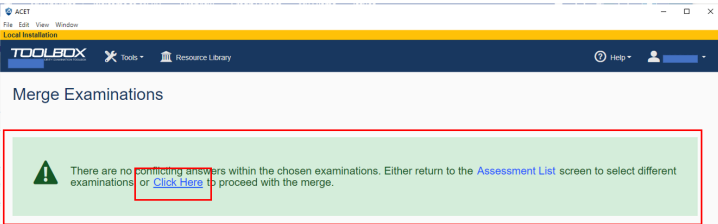
The result will be an additional examination in My Assessments labeled Merged with the charter number and the date. It will state it is a blank assessment until you open the examination. Go back to my assessments and the merge examination will be identified with "Merged" in the name.