Office of the Comptroller of the Currency

Cybersecurity and Financial System Resilience Report

Office of the Comptroller of the Currency
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Contents

Preface

The Consolidated Appropriations Act, 2021,[1] requires the Office of the Comptroller of the Currency (OCC) to issue an annual report to Congress for seven years, beginning in 2021, describing measures the OCC has taken to strengthen cybersecurity with respect to the agency's functions as a regulator. Functions include the supervision and regulation of financial institutions and, when applicable, third-party service providers.

As required by the Consolidated Appropriations Act, 2021, this report addresses

- an analysis of the OCC's internal cybersecurity policies and procedures adopted in accordance with the Federal Information Security Modernization Act (FISMA) of 2014.
- a description of the OCC's policies and procedures that guard against
  - efforts to deny access to or degrade, disrupt, or destroy information and communications technology systems or networks, or exfiltrate information from such a system or network without authorization.
  - destructive malware attacks.
  - denial of service activities.
  - other efforts that may threaten the functions of the OCC or OCC-supervised entities by undermining operational resilience and cybersecurity of the financial system.
- a description of the activities the OCC has undertaken to ensure the effective implementation of the policies and procedures described above, such as
  - the appointment of qualified staff, provision of staff training, use of accountability measures to support staff performance, and designation, if any, of senior appointed leadership to strengthen accountability for oversight of cybersecurity measures within the OCC and among OCC-supervised entities.
  - deployment of adequate resources and technologies.
  - efforts to respond to cybersecurity-related findings and recommendations of the U.S Department of the Treasury's inspector general or the independent evaluation described under FISMA.
  - industry efforts to respond to cybersecurity-related findings and recommendations of the banking regulators.
  - efforts to strengthen cybersecurity in coordination with other federal agencies, domestic and foreign financial institutions, and other partners, including the development and dissemination of best practices regarding cybersecurity and the sharing of threat information.
- a description of current and emerging threats likely to pose a risk to the resilience of the financial system.

[1] Refer to Pub. L. 116–260, Division Q, Section 108.

Executive Summary

The OCC charters, regulates, and supervises national banks and federal savings associations and licenses, regulates, and supervises federal branches and agencies of foreign banking organizations (collectively the "federal banking system").[2] As of September 30, 2024, the federal banking system comprised 1,040 banks operating in the United States. These banks range from small community banks to the largest, most globally active U.S. banks. Of these banks, 727 have less than $1 billion in assets, while 57 have more than $10 billion. In total, the banks within the federal banking system, excluding federal branches and agencies of foreign banks, hold $16 trillion in assets (66 percent of the total assets held by all U.S. banks).[3]

The OCC examines certain third-party services provided to banks based on authorities provided by the Bank Service Company Act and the Home Owners' Loan Act.[4] Examinations of these services are often coordinated jointly with the Board of Governors of the Federal Reserve System (Federal Reserve Board) and the Federal Deposit Insurance Corporation (FDIC).

The OCC views operational resilience and cybersecurity as top issues for the federal banking system and has reiterated this in the OCC's Fiscal Year 2025 Bank Supervision Operating Plan by making them key priorities for supervisory strategies.[5] Disruptive and destructive cyberattacks, such as ransomware and distributed denial of service (DDoS) attacks, continue to compromise security of technology systems, affect operations, and result in breaches of sensitive information across all sectors, including banking. Recent significant disruptions across many sectors, including the financial sector, highlight the importance of sound third-party risk management and operational resilience. Recent OCC *Semiannual Risk Perspective* reports emphasize the importance of banks continuing to conduct thorough risk assessments, use effective authentication practices, and remain vigilant of malicious actors' efforts to circumvent cybersecurity controls.[6]

Given continued cyber threats in the financial sector and heightened geopolitical tensions, the OCC continues to place a high priority on interagency and financial sector communications focusing on the importance of monitoring threats and sharing information. The OCC closely coordinates with U.S. Department of the Treasury's Office of Cybersecurity and Critical Infrastructure Protection (OCCIP), financial sector regulators, law enforcement agencies, and the U.S. Department of Homeland Security's (DHS) Cybersecurity and Infrastructure Security Agency (CISA) to monitor cybersecurity risks and potential threats to the U.S. financial system. The OCC also coordinates, as appropriate, with industry partners through the Financial Services Sector Coordinating Council (FSSCC) and Financial Services Information Sharing and Analysis

[2] This report refers to all entities under OCC supervision collectively as "banks" unless it is necessary to distinguish among them.

[3] Refer to the OCC's *2024 Annual Report*.

[4] Refer to 12 USC 1867(c) and 1464(d)(7).

[5] Refer to OCC News Release 2024-111, "OCC Releases Bank Supervision Operating Plan for Fiscal Year 2025."

[6] Refer to the OCC's *Semiannual Risk Perspective*.

Center (FS-ISAC). When appropriate, the OCC communicates alerts and other identified risks and threats to supervised financial institutions, often in coordination with interagency partners. This report discusses actions the OCC is taking to address heightened operational resilience and cybersecurity risks as part of supervisory processes and efforts to maintain the security and integrity of OCC internal systems and information assets. Key highlights include:

- regulations, supervisory guidance, examination manuals, and other publications that the OCC has developed on its own and with other agencies to communicate supervisory expectations and effective practices for operational resilience and cybersecurity.
- supervisory processes and banks' efforts to implement and maintain effective cybersecurity and operational resilience risk management practices and controls to safeguard against current and emerging threats.
- internal OCC cybersecurity policies, practices, and controls to safeguard sensitive information and assets that the agency maintains.
- views on operational resilience and cybersecurity threats to the federal banking system and efforts to communicate and share information with regulatory counterparts and the banking industry.

The OCC is committed to the effective oversight and supervision of the federal banking system in collaboration with the agency's domestic regulatory partners, international colleagues, and industry stakeholders.

Policies and Procedures to Safeguard Against Cybersecurity Threats

Oversight of OCC-Supervised Banks

The OCC issues regulations governing the safe and sound operations of national banks, federal savings associations, and federal branches and agencies of foreign banks (collectively referred to as "banks"). In addition, the OCC issues guidance and other information to communicate effective safe and sound practices, such as those related to cybersecurity. The OCC also issues examination manuals for examiners related to the agency's supervisory activities.[7] This section describes regulations, supervisory guidance and resources, and examination manuals related to the OCC's oversight of operational resilience and cybersecurity risks in the federal banking system.

Cybersecurity-Related Regulations

The OCC has implemented a number of regulations and enforceable safety and soundness standards, including requiring banks to implement appropriate information security programs and protect confidential information.

- **Safety and soundness standards**: The "Interagency Guidelines Establishing Standards for Safety and Soundness," 12 CFR 30, appendix A, set out the safety and soundness standards the OCC uses to identify and address problems at insured depository institutions before capital becomes impaired. The guidelines state that insured banks should have internal controls and information systems appropriate for the size of the institution and nature, scope, and risk of its activities and that provide for, among other standards, effective risk assessment and adequate procedures to safeguard and manage assets. The OCC's safety and soundness standards also state that insured banks should have internal audit systems that provide for adequate testing and review of information systems. In addition, the "OCC Guidelines Establishing Heightened Standards for Certain Large Insured National Banks, Insured Federal Savings Associations, and Insured Federal Branches," 12 CFR 30, appendix D, establish minimum standards for the design and implementation of a covered bank's risk governance framework and board of directors' oversight.[8]
- **Safeguarding customer information**: Pursuant to Title V, Subtitle A, of the Gramm–Leach–Bliley Act,[9] the OCC implemented guidelines requiring banks to establish appropriate

[7] For example, refer to *Comptroller's Handbook* and the Federal Financial Institutions Examination Council's *Information Technology (IT) Examination Handbook*.

[8] For purposes of 12 CFR Part 30, appendix D, the term "covered bank" means any bank: (i) with average total consolidated assets equal to or greater than $50 billion; (ii) with average total consolidated assets less than $50 billion if that bank's parent company controls at least one covered bank; or (iii) with average total consolidated assets less than $50 billion, if the OCC determines that the bank's operations are highly complex or otherwise present a heightened risk as to warrant the application of the guidelines pursuant to the reservation of authority in the guidelines (appendix D, I.C).

[9] Refer to 15 USC 6801–6809.

administrative, technical, and physical controls for safeguarding customer information. Working with the other federal banking agencies, the OCC published these standards as 12 CFR 30, appendix B, "Interagency Guidelines Establishing Information Security Standards." These interagency guidelines require banks to implement an information security program to ensure the security and confidentiality of customer information; protect against any anticipated threats or hazards to the security or integrity of such information; protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer; and ensure the proper disposal of customer and consumer information.

- **Suspicious activity reporting**: OCC regulations require banks to file suspicious activity reports when banks detect a known or suspected violation of federal law, or a suspicious transaction related to illegal activity or a violation of the Bank Secrecy Act.[10] This includes expectations for reporting certain computer crimes.[11]
- **Computer-security incident notification rule**: The OCC, the FDIC, and the Federal Reserve Board issued a rule to establish computer-security incident notification requirements for banking organizations and their bank service providers.[12] The rule requires a banking organization to notify its primary federal regulator as soon as possible and no later than 36 hours after determining that a computer-security incident that rises to the level of a notification incident has occurred.[13] The rule also requires a bank service provider to notify at least one bank-designated point of contact at each affected customer bank as soon as possible when the bank service provider determines it has experienced a computer-security incident that has materially disrupted or degraded, or is reasonably likely to materially disrupt or degrade, covered services provided to the bank for four or more hours.

Supervisory Guidance and Resources

The OCC publishes—on its own and in conjunction with other regulatory agencies—supervisory guidance and other documents to help banks understand supervisory expectations, increase awareness of cybersecurity risks, and assess and mitigate risks. Examples of cybersecurity-related supervisory guidance and other documents include the following:

- "Sound Practices to Strengthen Operational Resilience"[14]
- "Joint Statement on Security in a Cloud Computing Environment"[15]

[10] Refer to 12 CFR 21.11 and 163.180.

[11] Refer to FinCEN Advisory - FIN-2016-A005, "Advisory to Financial Institutions on Cyber-Events and Cyber-Enabled Crime."

[12] Refer to OCC Bulletin 2021-55, "Computer-Security Incident Notification: Final Rule," and 12 CFR 53.

[13] Refer to OCC Bulletin 2022-8, "Information Technology: OCC Points of Contact for Banks' Computer-Security Incident Notifications."

[14] Refer to OCC Bulletin 2020-94, "Operational Risk: Sound Practices to Strengthen Operational Resilience."

[15] Refer to OCC Bulletin 2020-46, "Cybersecurity: Joint Statement on Security in a Cloud Computing Environment."

- "Joint Statement on Heightened Cybersecurity Risk"[16]
- "FFIEC Statement on Authentication and Access to Financial Institution Services and Systems"[17]

Many cybersecurity publications and resources have been coordinated through the Federal Financial Institutions Examination Council (FFIEC),[18] including the "Cybersecurity Resource Guide for Financial Institutions"[19] which provides resources designed to assist financial institutions with cybersecurity preparedness and resilience. These resources can be accessed on the FFIEC's "Cybersecurity Awareness."

In addition to OCC and interagency publications and resources, the OCC regularly communicates to banks and service providers other U.S. government agency guidance and relevant alerts. The OCC will continue to review and update existing supervisory approaches, including improvements to the OCC's cybersecurity supervision work program.

Appendix A of this report provides a list of key cybersecurity-related supervisory guidance statements and other resources published by the OCC and its regulatory partners from 2014 to 2025.

Examination Manuals

The OCC oversees the federal banking system by implementing and enforcing federal banking laws and maintaining a supervisory and regulatory framework for banks that contributes to the safety, soundness, and fairness of the federal banking system. This supports banks' efforts to innovate responsibly and adapt to meet the evolving financial needs of consumers, businesses, and communities nationwide.[20] The OCC uses a risk-based supervision process focused on evaluating banks' risk management, identifying material and emerging concerns, and requiring banks to take corrective action when warranted. The supervision process is outlined in the *Comptroller's Handbook.*[21]

The OCC uses the FFIEC's Uniform Rating System for Information Technology (URSIT) to assess and rate information technology (IT) risks at financial institutions, their affiliates, and service providers to identify those institutions that require special supervisory attention. The URSIT framework includes elements to assess information security and other risk management

[16] Refer to OCC Bulletin 2020-5, "Cybersecurity: Joint Statement on Heightened Cybersecurity Risk."

[17] Refer to OCC Bulletin 2021-36, "Information Security: FFIEC Statement on Authentication and Access to Financial Institution Services and Systems."

[18] The FFIEC, established in 1979, comprises the OCC, FDIC, Federal Reserve Board, National Credit Union Administration, Consumer Financial Protection Bureau, and the State Liaison Committee.

[19] Refer to OCC Bulletin 2022-22, "Cybersecurity: 2022 Cybersecurity Resource Guide for Financial Institutions."

[20] Refer to the OCC's *2024 Annual Report*.

[21] For example, refer to "Bank Supervision Process" booklet of the *Comptroller's Handbook.*

factors to determine the quality, integrity, and reliability of the bank's or third-party service provider's IT.[22]

For detailed IT information and work programs, OCC examiners use the *Comptroller's Handbook* and the *FFIEC Information Technology (IT) Examination Handbook*. The *FFIEC IT Examination Handbook* is a series of booklets addressing IT-related supervision topics. The booklets include examination work programs. Aspects of cybersecurity are in various booklets such as "Management," "Information Security," "Business Continuity Management," "Development, Acquisition and Maintenance," and "Architecture, Infrastructure, and Operations."[23]

Appendix B of this report provides a list of key technology- and cybersecurity-related examination manuals published by the OCC individually and through the FFIEC.

Outreach Efforts

The OCC regularly engages in outreach efforts to engage with banks and other stakeholders to communicate operational resilience and cybersecurity risks and best practices through several forums. The OCC regularly hosts outreach meetings for supervised banks and will structure certain meetings for key bank roles, such as board members, chief executive officers, chief risk officers, chief information officers, chief technology officers, and chief information security officers, to better structure content, including topics related to operational resilience and cybersecurity. Additionally, OCC subject matter experts speak at industry-sponsored forums on cybersecurity, operational resilience, and third-party risk management.

OCC Internal Security

The OCC operates a comprehensive information security and cyber protection program to protect the information and information systems that support its operations and assets, including the sensitive supervisory information in the agency's custody. The program includes

- policies, standards, and controls that meet or exceed requirements established by FISMA and related issuances from the Office of Management and Budget (OMB), CISA, and National Institute of Standards and Technology (NIST).
- 24/7/365 cyber defense operations and technologies.
- 24/7/365 cyber incident response capabilities.
- a cross-functional data breach response team that complements incident response capabilities by providing management oversight and support to evaluate actual or suspected data loss events and guide the agency's response to such events.
- information assurance processes in the OCC's system development and acquisition life cycle.
- continuous monitoring and assessment of security and privacy control effectiveness.
- information security awareness and privacy training.

[22] Refer to the "Uniform Rating System for Information Technology" section of the "Bank Supervision Process" booklet of the *Comptroller's Handbook*.

[23] Refer to the FFIEC IT Examination Handbook InfoBase.

The OCC operates full life cycle incident prevention, detection, disruption, and response processes, including

- configuration and operation of intrusion prevention and detection, advanced persistent threat detection, endpoint malware prevention and detection, and data loss prevention technologies.
- threat intelligence tools and services employing industry and federal sources.
- operation of a mature enterprise logging infrastructure to support continuous monitoring of all network traffic and event correlation for the discovery of anomalous cyber activity across the network and its end hosts. This reflects direction as outlined in OMB M-21-31, "Improving the Federal Government's Investigative and Remediation Capabilities Related to Cybersecurity Incidents."

The OCC maintains and routinely exercises disaster recovery, continuity of operations, and information system contingency plans to ensure that effective resources and procedures are in place to enable recovery and reconstitution of critical agency functions and supporting information systems in response to disrupted or diminished service conditions.

Implementation of Cybersecurity Policies and Procedures

The OCC's bank supervision and the agency's own internal governance focus on (1) maintaining fundamental security risk management practices and controls to safeguard against cyber threats and (2) emphasizing the importance of effective response programs and operational resilience capabilities to mitigate and limit the impact in the event of a cybersecurity incident. The OCC published its supervisory priorities in its Fiscal Year 2025 Bank Supervision Operating Plan to provide the foundation for policy initiatives and supervisory strategies as applied to individual national banks, federal savings associations, federal branches, federal agencies, and third-party service providers, listing operational resilience and cybersecurity as a top priority.[24]

Oversight of OCC-Supervised Banks

Staffing and Resources

As of September 30, 2024, the OCC had approximately 2,355 bank examiners.[25] The OCC has an internal training and development curriculum for examiners, which includes bank IT courses that incorporate cybersecurity concepts. These courses are supplemented with specific training and workshops on emerging issues and technology, such as ransomware, distributed ledger technology, and artificial intelligence (AI). All safety and soundness examiners receive sufficient training to conduct IT and cybersecurity examinations at noncomplex community banks.

In addition to safety and soundness examiners, the OCC has a cadre of IT specialist examiners who are subject matter experts and focus on complex supervisory issues related to technology operations, including cybersecurity. Many of these specialists hold industry certifications such as ISACA's Certified Information Systems Auditor or the ISC2 Certified Information Systems Security Professional (CISSP).[26] To gain further expertise on IT and cybersecurity topics, IT specialist examiners regularly attend industry conferences to learn about emerging trends and risks and to take advanced external training.

In June 2025 the OCC combined the Midsize and Community Bank Supervision and Large Bank Supervision functions to create the Bank Supervision and Examination (BSE) line of business.[27] Large Bank Supervision oversaw banks that have between $50 billion and $3 trillion in assets. Midsize Bank Supervision generally included banks with assets between $15 billion and $115 billion. Community Bank Supervision focused on banks that range from $1 billion to $15 billion in assets; most with less than $1 billion.

[24] Refer to OCC News Release 2024-111, "OCC Releases Bank Supervision Operating Plan for Fiscal Year 2025."

[25] Refer to the OCC's *2024 Annual Report*.

[26] Refer to ISACA's CISA certification page and ISC2's CISSP certification page.

[27] Refer to OCC News Release 2025-34, "OCC Announces Changes to Organizational Structure."

In addition to the BSE line of business, the OCC has additional supervision and subject matter expert resources that support cybersecurity oversight and supervision, including the following:

- The Systemic Risk Identification and Support (SyRIS) department, within the Chief National Bank Examiner (CNBE) office, identifies, evaluates, and collaborates with intra- and interagency counterparts to holistically assess and address risks that affect the OCC's mission as it relates to supervision, provides subject matter expertise across all risk disciplines, assists in resource prioritization, and provides direct supervision of services provided by significant service providers.
- Bank Supervision Policy (BSP), within CNBE, maintains three policy units that focus on operational resilience and cybersecurity risks:[28]
  - The Bank Information Technology Policy unit develops and maintains supervisory guidance, resources, examination manuals, and supervisory tools that help examiners conduct cybersecurity supervision, such as the *FFIEC IT Examination Handbook* and related work programs.
  - The Critical Infrastructure Policy unit identifies and assesses systemic operational risks that could degrade or interrupt the federal banking system and lead to national economic concerns. The unit also supports the coordination of internal responses and information-sharing during critical infrastructure events, such as cybersecurity incidents.
  - The Governance and Operational Risk Policy unit works to promote effective risk-based supervision and develops guidance on governance, operational risk, and related topics to help OCC staff meet the agency's overall mission. This includes addressing current and emerging risks, providing consistent interpretation to examiners, developing educational tools and resources, and delivering internal and external outreach.
- The Office of Financial Technology, within CNBE, is the OCC's central contact and clearinghouse for requests and information related to innovation in the federal banking system. This unit coordinates OCC outreach and engagement with banks and financial technology companies on new or innovative products, services, and technologies being considered or implemented in the federal banking system. This can include coordination on issues related to operational resilience and cybersecurity for new or innovative products, services, and technologies.

Bank Supervision Activities

The OCC conducts full-scope examinations of each bank every 12 to 18 months depending on the bank's characteristics, such as asset size and financial condition.[29] The 12- to 18-month full-

[28] BSP provides timely information, analysis, policy guidance, and examination procedures, and encourages an OCC culture receptive to responsible innovation. The department also supports examiners, OCC senior management, and other OCC stakeholders on emerging risk and supervisory issues confronting the financial system and federal banks and collaborates with domestic and international regulators.

[29] The OCC examines banks pursuant to the authority conferred by 12 USC 481, 1463, and 1464, as well as the requirements of 12 USC 1820(d). The OCC examines federal branches and agencies pursuant to the authority conferred by 12 USC 3105(c)(1)(C). In addition, 12 USC 1820(d) requires the OCC to conduct a full-scope examination of each insured depository institution every 12 or 18 months. The OCC applies this statutory requirement to all types of banks (federal branches and agencies excepted), regardless of FDIC-insured status, as set forth by 12 CFR 4.6. The frequency of full-scope examinations for federal branches and agencies is prescribed by

scope examination frequency is referred to as the supervisory cycle. Statutory and regulatory requirements generally set the maximum supervisory cycle length but do not limit the OCC's authority to examine a bank as frequently as the agency deems appropriate.[30] As part of every supervisory cycle, the OCC conducts an IT assessment for each bank that includes an examination of cybersecurity risk management and controls.

The supervisory strategy is the OCC's detailed supervisory plan for each bank, outlining supervisory objectives, activities, and work plans. Strategies are developed for each supervisory cycle and updated as needed throughout. Strategies define the goals of supervision for a specific bank based on its risk profile, and they are the foundation for supervisory activities and work plans to be conducted during the supervisory cycle. Examinations of specific areas, such as IT and cybersecurity, are conducted as part of a full-scope or targeted examination. Key aspects of the supervisory process related to cybersecurity include:

- **IT rating**: Examiners assess a bank's ability to identify, measure, monitor, and control IT risks related to information security, business continuity planning, audit, systems development, outsourcing, and other assessment factors outlined in the URSIT. In addition, examiners assess compliance with 12 CFR 30, appendix B, "Interagency Guidelines Establishing Information Security Standards." Examiners complete an IT core assessment for each bank during every supervisory cycle.[31] The *FFIEC IT Examination Handbook* has detailed work programs that supplement the core assessment.
- **Risk assessment system:** The OCC's risk assessment system is a concise method of communicating and documenting conclusions on seven risk categories: credit, interest rate, liquidity, price, operational, compliance, and strategic. Examiners draw conclusions on the quantity of risk, quality of risk management, aggregate risk, and direction of risk for each of the seven categories. Examiners consider the results of IT assessments when drawing risk assessment system conclusions for relevant risk categories, such as operational, compliance, and strategic.[32]
- **Cybersecurity Supervision Work Program**: The OCC continues to review and update supervisory approaches. As cyberattacks evolve and as banks adopt various standardized tools and frameworks to assess cybersecurity preparedness, the OCC recognized the need to update its approach to cybersecurity assessment as part of the agency's bank supervision. In 2023 the OCC released the Cybersecurity Supervision Work Program (CSW).[33] The CSW provides high-level examination objectives and procedures that are aligned with existing

12 USC 3105(c) and 12 CFR 4.7. For more information, refer to the "Bank Supervision Process" booklet of the *Comptroller's Handbook.*

[30] A potential or actual adverse change in a bank's condition or risk profile, a change in bank control, or an OCC scheduling conflict are examples of when the OCC may determine that it would be appropriate to examine the bank more frequently.

[31] Refer to the "Community Bank Supervision," "Federal Branches and Agencies Supervision," and "Large Bank Supervision" booklets of the *Comptroller's Handbook.*

[32] For more information, refer to the "Bank Supervision Process" booklet of the *Comptroller's Handbook.*

[33] Refer to the Cybersecurity Supervision Work Program Overview.

supervisory guidance and the NIST Cybersecurity Framework (CSF).[34] Recognizing that OCC-supervised banks use different frameworks to manage their cybersecurity programs, the CSW cross-references OCC examination procedures to the NIST-CSF, *FFIEC IT Examination Handbook*, and other common industry cybersecurity frameworks. The OCC continues to encourage but does not require banks' use of a standardized approach to assess cybersecurity preparedness.[35]

- **Ongoing supervision:** Ongoing supervision is the OCC's process for assessing risks and reviewing core knowledge about a bank. Ongoing supervision conclusions can result in changes to the OCC's supervisory strategy, regulatory ratings, or risk assessment system conclusions for a bank.
- **Other resources**: Examiners use cybersecurity concepts that are communicated in or through the supervisory publications, such as the *FFIEC IT Examination Handbook.* Other resources include
  - the NIST-CSF,
  - the Center for Internet Security Critical Security Controls,
  - the Cyber Risk Institute's Financial Sector Cybersecurity Profile,
  - MITRE ATT&CK, and
  - alerts and guidance issued from such organizations as CISA and law enforcement.
- **Communicating examination findings**: As part of the supervision process, the OCC is committed to ongoing, effective communication with supervised banks, such as formal and informal conversations, scheduled meetings, issuance of supervisory letters, reports of examination, and other written communication. Communication is ongoing throughout the supervisory process and tailored to a bank's structure and dynamics; the timing and form depend on the situation being addressed. Results of OCC examinations are communicated to a bank's board and management through reports of examination and supervisory letters.
- **Deficient practices**: When examiners identify deficient practices,[36] the OCC takes appropriate supervisory action to require a bank to take corrective action. The primary vehicle used to communicate supervisory concerns to a bank's board and management is in the form of matters requiring attention (MRA). Examiners cite violations of laws and regulations in writing. Violations, deficient practices, or unsafe or unsound practices also may serve as the basis for an enforcement action. Formal enforcement actions are public and may be cease-and-desist orders, civil money penalty orders, and other actions. The OCC conducts periodic follow-up of a bank's corrective actions in response to MRAs, violations, and enforcement actions.[37]

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[34] Refer to the NIST-CSF.

[35] Refer to "FFIEC Encourages Standardized Approach to Assessing Cybersecurity Preparedness," August 28, 2019.

[36] A deficient practice is a practice, or lack of practice, that
- deviates from sound governance, internal control, or risk management principles and has the potential to adversely affect the bank's condition, including financial performance or risk profile, if not addressed, or
- results in substantive noncompliance with laws or regulations, enforcement actions, or conditions imposed in writing in connection with the approval of any applications or other requests by the bank.

[37] Refer to the "Bank Supervision Process" booklet of the *Comptroller's Handbook.*

Interagency Supervision Activities

The OCC actively coordinates with the FDIC and Federal Reserve Board on operational resilience and cybersecurity supervision for large, complex, and interconnected organizations within the banking sector. One example of this coordination is the interagency coordinated cybersecurity review program. It is designed to align and improve the efficiency of cybersecurity supervision at the largest and most systemically important financial institutions through better examination coordination and resource use by federal banking regulators. By coordinating their reviews of the largest banking organizations, the agencies can better focus on the areas of highest cybersecurity risk to the federal banking system, increase efficiencies in the use of cybersecurity supervision subject matter experts across the agencies, and provide more effective supervision of highly complex organizations.

Another example of interagency coordination is the examination of services performed by significant third parties for supervised banks. Service providers can pose a significant risk to their clients and the banking system if the providers have operational or financial issues that affect the delivery of critical services. These examinations are typically conducted jointly by the OCC, FDIC, and Federal Reserve Board, and when applicable, with the participation of state banking regulators. Key aspects of the service provider examination program include the following:

- Service providers are identified for examination using several factors, such as the criticality of services provided, number of banking institutions serviced, and total assets serviced.
- Examinations typically focus on services such as core banking services (e.g., loans, deposits, and balance sheet activities), payment services, technology infrastructure services, mortgage processing, and trust services.
- Examination activities at service providers follow interagency guidelines and use the *FFIEC IT Examination Handbook* and other applicable guidance.[38]
- Annual strategies are developed for service provider examination activities. The strategies define supervisory goals for a specific service provider based on the risk profile of the services provided, including cybersecurity-related activities, and emerging risks across the industry.
- The OCC, FDIC, and Federal Reserve Board have implemented a consistent framework for cybersecurity assessments for services provided by third parties, based on the *FFIEC IT Examination Handbook*.

Similar to supervision of banks, reports of examination are issued for service providers, and, when appropriate, concerns with deficient practices are communicated in writing. Reports of examination are made available to client financial institutions receiving contracted services.

Banks' Efforts to Respond to Operational Resilience and Cybersecurity Concerns

Cybersecurity and technology management continue to be key areas of supervisory concern. Although banks have made significant investments in their security programs, continuous

[38] Refer to *Implementation of Interagency Programs for the Supervision of Technology Service Providers*, October 31, 2012.

vigilance is important to adapt to the changing cyber threat landscape. Banks have been responsive to identified cybersecurity concerns; however, cybersecurity threats continue to evolve, and opportunities remain for further improvement.

The *Semiannual Risk Perspective* regularly highlights cybersecurity as a key risk. Recent issues have featured cybersecurity as an elevated risk as cyberattacks continue to evolve and become more sophisticated and pervasive.[39] Continuing cyberattacks and geopolitical tensions highlight the importance of heightened threat monitoring and safeguarding against disruptive attacks targeting the financial sector. Threat actors continue to exploit publicly known software vulnerabilities and weak authentication at targeted organizations, including banks and financial service providers. Ransomware actors continue to affect the sector by targeting banks and their third parties. Threat actors continue to use phishing emails and texts targeting employees and compromised credentials to gain access to networks through remote access solutions. Such unauthorized access may enable threat actors to conduct ransomware and other extortion campaigns that can affect bank customers. Malicious actors have also continued to use DDoS attacks to target the financial sector.

To mitigate against cyber risks, it is important for banks to adopt heightened threat and vulnerability monitoring processes and implement effective security measures, including the use of multifactor authentication, hardening of systems configurations, and timely patch management.

Prolonged use of older or legacy systems can also introduce security vulnerabilities, create system maintenance challenges, and cause issues that reduce the resilience of operations. While OCC-supervised banks continue to invest significant resources in maintaining and updating existing technology architecture, some banks encounter challenges keeping up with technological advances while maintaining legacy infrastructure. Decisions to postpone system updates or delay technology architecture upgrades can create unwarranted risks to an organization. OCC supervision has focused on technology resilience and has identified supervisory concerns related to end-of-life, patch management, and system and data architecture. Banks should align technology architecture planning with their cybersecurity programs to ensure that systems are appropriately maintaining adequate safeguards against cyber threats and can maintain resilient operations.

The risk to supply chain operations continues to increase and evolve as attacks target vulnerabilities in software and systems commonly used by large numbers of organizations. Threat actors are increasingly exploiting vulnerabilities in IT systems and third-party software to conduct malicious cyber activities while negotiating ransom payments. These attacks demonstrate the importance of banks assessing the risks arising from their third parties and developing a comprehensive approach to operational resilience and supply chain risk.

Recent *Semiannual Risk Perspective* reports and other agency issuances continue to highlight the key role that third-party relationships can have on a bank's operational resilience and cybersecurity. Effective risk management of third-party relationships—especially those that support higher-risk and critical activities—is important for safe and sound operations. The OCC,

[39] Refer to the OCC's *Semiannual Risk Perspective*.

FDIC, and Federal Reserve Board issued interagency guidance on risk management for third-party relationships on June 6, 2023.[40] This update from existing OCC third-party risk management guidance includes key considerations for operational resilience and cybersecurity when banks engage with third parties.

Community banks often engage with third parties to help the banks compete in and respond to an evolving financial services landscape. Third-party relationships can offer community banks access to new technologies, risk management tools, human capital, delivery channels, products, services, and markets. Reliance on third parties, however, reduces a bank's direct operational control over activities and may introduce new risks or increase existing risks. In May 2024 the OCC, FDIC, and Federal Reserve Board issued an interagency guide to assist community banks appropriately identify, assess, monitor, and control these risks, ensure that activities are performed in a safe and sound manner, and comply with applicable laws and regulations.[41] This guide serves as a resource for bank management in accordance with the principles in the "Interagency Guidance on Third-Party Relationships: Risk Management" and "Conducting Due Diligence on Financial Technology Companies: A Guide for Community Banks."[42]

Efforts to Respond to Independent Reviews of OCC Supervision

The OCC is subject to oversight by the Treasury Department's Office of the Inspector General (OIG) and the U.S. Government Accountability Office (GAO). The OCC has been subject to several inspections related to cybersecurity, either directly or as part of broader financial agency reviews. The OCC has been responsive to all independent assessments and implemented corrective actions for recommendations addressed to the agency. All OIG and GAO audit reports are available for review on their respective websites.

Domestic and International Coordination on Cybersecurity

The OCC coordinates with several domestic and international organizations to share cyber threat information, communicate effective cybersecurity practices, and align cybersecurity efforts. In addition to the direct interagency coordination efforts already outlined in this report, one of the key vehicles for coordination is the FFIEC. Through the FFIEC's Task Force on Supervision, groups such as the Cybersecurity and Critical Infrastructure Subcommittee and the Information Technology Subcommittee have developed and published a wide range of documents and resources for assessing cybersecurity risks.

The OCC actively coordinates with the Treasury Department's OCCIP and the broader financial sector regulatory agencies by participating on the Financial and Banking Information Infrastructure Committee (FBIIC).[43] The FBIIC, chaired by the Treasury Department, was

[40] Refer to OCC Bulletin 2023-17, "Third-Party Relationships: Interagency Guidance on Risk Management."

[41] Refer to OCC Bulletin 2024-11, "Third-Party Relationships: A Guide for Community Banks."

[42] Refer to OCC Bulletin 2021-40, "Third-Party Relationships: Conducting Due Diligence on Financial Technology Companies: A Guide for Community Banks."

[43] Refer to the FBIIC.

chartered under the President's Working Group on Financial Markets and comprises 18 federal and state financial services regulatory agencies or organizations that provide supervision of the banking, investment, and insurance subsectors.

The FBIIC helps coordinate interagency efforts to improve the reliability and security of the financial sector infrastructure by sharing threat information and effective security practices and coordinating responses to cybersecurity incidents and other significant events that affect the financial sector. For example, the OCC supported U.S. Treasury efforts to issue *The Financial Services Sector's Adoption of Cloud Services* report, identifying cloud service use in the financial sector and security and resilience risks and challenges associated with the increasing trend of financial sector firms adopting cloud service technology.[44]

In May 2023 Treasury launched the Cloud Executive Steering Group (CESG) to address issues identified in this report, including those related to cybersecurity. The OCC is an active member of the CESG, a public-private partnership dedicated to bolstering regulatory and private sector cooperation.[45] The multi-pronged follow-up effort aims to ensure that Treasury, financial federal regulators, and the financial sector work together to address challenges associated with the increasing trend of cloud adoption identified in the report. One recent, notable outcome of this effort is the *U.S. Treasury Shared Cloud Lexicon and Terminology*, published in July 2024.[46]

In addition to coordinating with domestic regulatory counterparts, the OCC engages with industry groups, as appropriate. The OCC engages with the FSSCC, through the FBIIC, to coordinate on topics such as sector-wide cyber exercises, training, information-sharing, situational awareness, and incident communication and coordination. The OCC plays an active role in regularly scheduled joint FBIIC/FSSCC meetings. This partnership is fully articulated in the interagency *Financial Services Sector-Specific Plan 2015*.

The OCC partners with federal agencies to coordinate cyber incident reporting efforts. In March 2022 President Joe Biden signed the Cyber Incident Reporting for Critical Infrastructure Act of 2022 (CIRCIA) into law.[47] CIRCIA requires covered entities to report covered cyber incidents and ransomware payments to CISA. The OCC participates on the intergovernmental Cyber Incident Reporting Council (CIRC), established by CIRCIA, tasked with coordinating, deconflicting, and harmonizing federal incident reporting requirements. CIRCIA required DHS, in consultation with CIRC members, to provide Congress with a report identifying duplicative reporting requirements, challenges to harmonization, actions the CISA Director intends to take to facilitate harmonization, and any proposed legislative changes to address duplicative reporting.

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[44] Refer to Treasury Department press release, "New Treasury Report Assesses Opportunities, Challenges Facing Financial Sector Cloud-Based Technology Adoption," February 8, 2023.

[45] Refer to the Treasury Department press release, "U.S. Department of the Treasury Kicks Off Public-Private Executive Steering Group to Address Cloud Report Recommendations," May 25, 2023.

[46] Refer to "Cloud Executive Steering Group."

[47] Refer to Cyber Incident Reporting for Critical Infrastructure Act of 2022.

DHS issued this report in September 2023.[48] The ongoing work of the CIRC should also complement and inform CISA's implementation efforts under CIRCIA.

The OCC is actively participating in the Cybersecurity Forum for Independent and Executive Branch Regulators. The forum's purpose is to increase the overall effectiveness and consistency of regulatory agency cybersecurity efforts pertaining to U.S. critical infrastructure. Additionally, the forum seeks to identify and explore opportunities to promote a united effort across participating agencies and to use and deconflict cross-sector regulatory authorities' approaches to strengthen the nation's cybersecurity posture. The forum meets monthly to discuss broad government cybersecurity goals outlined in Executive Order 14028 and coordinate implementation of CIRCIA.

The OCC coordinates regularly with the FS-ISAC for threat and vulnerability monitoring and resilience efforts. FFIEC members issued a statement encouraging financial institutions to join and engage with FS-ISAC to increase participation and coordination.[49] When appropriate, the OCC engages with law enforcement and other government agencies regarding threat information or specific issues affecting financial institutions.

Another example of OCC coordination efforts is the Hamilton series of exercises developed by private sector groups, the Treasury Department, and other relevant U.S. government agencies to simulate an assortment of cyber or other resilience events affecting the financial sector to improve public and private sector coordination. A key outcome resulting from the exercises is Sheltered Harbor, a voluntary industry initiative for data vaulting to safeguard critical data in the event of a destructive malware attack.[50] The OCC issued an interagency statement noting that institutions should consider whether their backup and restoration practices are consistent with industry standards and frameworks, including Sheltered Harbor.[51]

The OCC regularly engages internationally on operational resilience and cybersecurity-related matters. Examples of such engagement include serving as a member on the Basel Committee on Banking Supervision (BCBS) and participating as an observer with the Financial Stability Board (FSB). These groups work to establish common principles across jurisdictions on key issues facing the global financial system. Examples of publications from these groups are BCBS's *Principles for Operational Resilience* (March 31, 2021); FSB's *Recommendations to Achieve Greater Convergence in Cyber Incident Reporting: Final Report* (April 13, 2023); FSB's *Enhancing Third-Party Risk Management and Oversight* (December 4, 2023); and FSB's *Effective Practices for Cyber Incident Response and Recovery* (October 19, 2020). Appendix C of this report highlights key domestic and international groups that the OCC collaborates with on operational resilience and cybersecurity-related matters.

[48] DHS, *Harmonization of Cyber Incident Reporting to the Federal Government*, September 19, 2023.

[49] Refer to FFIEC press release, "FFIEC Releases Cybersecurity Assessment Observations, Recommends Participation in Financial Services Information Sharing and Analysis Center," November 3, 2014.

[50] Refer to "Sheltered Harbor."

[51] Refer to OCC Bulletin 2020-5, "Cybersecurity: Joint Statement on Heightened Cybersecurity Risk."

OCC Internal Security

The OCC Chief Information Officer (CIO) designates the OCC Chief Information Security and Chief Privacy Officer (CISO) to fulfill the CIO's responsibilities under FISMA. OCC hiring procedures for the CISO are designed to ensure that this individual has the requisite professional qualifications and singular mission focus to conduct these responsibilities. The OCC CISO develops and leads the OCC's Information Security and Cyber Protection program and serves as director for the OCC Cyber Security Office (CSO), a division of the CIO's organization with the mission and resources to help the agency manage its information security and cybersecurity risks. The key program areas within CSO are cybersecurity operations, cybersecurity readiness, cyber assurance and compliance, data privacy and security, cyber policy, and disaster recovery.

Individual development plans for CSO staff members target professional certifications and skill development along with CISO priorities in areas of interest, such as zero trust architecture and cloud security. In accordance with the Federal Cybersecurity Workforce Assessment Act of 2015, the National Initiative for Cybersecurity Education coding structure is applied to position descriptions involving cybersecurity responsibilities to ensure that proper qualifications are required for these positions.

The OCC Information Security and Cyber Protection program spans the agency offices, programs, operations, and processes required to protect OCC information and information systems against threats to their confidentiality, integrity, and availability. The CSO delivers ongoing agency-wide awareness and training for the OCC end-user community to ensure that all agency personnel understand their program responsibilities and their individual accountability for their actions regarding these responsibilities. For several years, this awareness and training effort has focused on five key cybersecurity risks associated with end-user behavior: unauthorized release of sensitive information; malware infection of a computer or device; loss of OCC-issued IT equipment or personal identity verification credential; unencrypted email transmission of personally identifiable information; and a successful phishing attempt. Regular phishing exercises and routine information security bulletins target behavior improvements, with ongoing tracking and reporting available to management to encourage individual accountability for protecting OCC information.

As the senior appointed leader at the OCC, the Comptroller is responsible for signing and attesting that the agency has met FISMA's annual reporting requirement. The CISO produces regular cybersecurity/privacy briefings and ad hoc briefs for the Comptroller, OCC senior deputy comptrollers, and the OCC Chief Risk Officer (CRO). Senior deputy comptrollers serve on senior executive subcommittees focusing on technology investment and enterprise risk management.

Adequate resources and technologies for implementing the OCC's Information Security and Cyber Protection program are allocated using a risk-based approach that integrates the CIO's work intake and planning processes with agency budget activities. The CIO collaborates with the OCC senior executive subcommittee on technology investment to prioritize capital investment projects that address the most significant technology risks to the agency, including cybersecurity risks.

Consistent with FISMA requirements, the OCC engages resources through the Treasury Department's OIG to conduct an annual evaluation of the Information Security and Cyber Protection program. The OCC achieved a Level 4 maturity rating in the OIG's fiscal year 2024 FISMA audit and has maintained a "Managing Risk" rating for its performance on quarterly CIO FISMA metrics.[52] The OCC received important assurance in March 2024 from an independent assessment by a leading cybersecurity service confirming no instances of any advanced persistent threat in the agency's on-premise IT network environment. Additionally, the OCC partnered with this service on an assessment of its cloud environment following a February 2025 declaration of an incident in its cloud environment and confirmed no lateral movement related to this incident into the agency's on-premise IT network environment.[53]

The CSO manages a plan of actions and milestones process that ensures that tasks and action items are developed in response to any findings or weaknesses in security and privacy controls identified through regular internal assessments or routine operational security activities. This process also is used to track and report on the remediation of findings and implementation of recommendations issued by the OIG in response to its evaluation of the OCC Information Security and Cyber Protection program and supporting practices.

The OCC's cybersecurity coordination with other federal agencies centers on its responsibility as an independent regulatory agency to report directly to CISA and OMB in response to cybersecurity directives and tasks. The OCC ensures that all CISA and OMB reporting is shared with the Treasury Department to facilitate cross-departmental information-sharing and collaboration on cyber threats and vulnerabilities. Formal and informal collaboration, consultation, and benchmarking on key cybersecurity issues are conducted with other regulatory agencies and FFIEC member agencies.

[52] Refer to FY 2023-2024 Inspector General Federal Information Security Modernization Act of 2014 (FISMA) Reporting Metrics.

[53] Refer to OCC News Release 2025-13, "OCC Reports Security Incident Involving Email System." After further investigation in consultation with Treasury, the OCC determined that the incident qualified as a "major incident" as defined in OMB Memorandum M-25-04, and on April 8, 2025, notified Congress of such and published a related news release on its public website. Refer to OCC New Release 2025-30, "OCC Notifies Congress of Incident Involving Email System."

Current and Emerging Cybersecurity Threats

Oversight of Supervised Institutions

Cybersecurity Threat Information-Sharing

The OCC actively monitors for emerging threats through the supervisory process, engagement with federal partners, and monitoring sector alerts. The OCC's Critical Infrastructure Policy unit is responsible for identifying and assessing systemic operational risk that could degrade or interrupt the federal banking system and lead to national economic security concerns. As part of these efforts, the unit regularly monitors FS-ISAC, Homeland Security Information Network, Financial Crimes Enforcement Network, and other open-source, cyber-related information feeds to maintain situational awareness of evolving financial sector risks. OCC supervision teams respond to reports of security incidents and operational outages that occur at supervised institutions and monitor trends to assess emerging risks.

The OCC encourages banks to engage with and monitor threat notices and alerts from FS-ISAC, CISA, and other similar threat information-sharing forums to receive timely, actionable threat information. When appropriate, the OCC directly shares alert information, often with interagency counterparts, through internal communication channels to reinforce its importance and emphasize risk mitigation.

The OCC actively engages in sharing information with financial regulators to coordinate assessments and response. The Treasury Department is the sector risk management agency for the financial services sector, and the OCC coordinates with OCCIP and other FBIIC members on cybersecurity and critical infrastructure matters. The OCC participates in regularly scheduled FBIIC classified meetings where threat and vulnerability information is conveyed by the Treasury Department and other federal agencies, such as DHS, and intelligence community agencies and partners. When identifying and responding to cyber threats and vulnerabilities affecting financial institutions, the OCC engages with federal law enforcement and other agencies as needed for support.

Current and Emerging Cybersecurity Threats

The OCC has several mechanisms to identify and measure current and emerging risks to the banking sector. One of the key groups focused on this analysis is the OCC's National Risk Committee. Members are senior agency officials who supervise banks of all sizes and develop bank supervisory policy. The committee monitors the condition of the federal banking system and identifies key risks and emerging threats to the system's safety and soundness and ability to provide fair access to financial services and treat customers fairly. The OCC has been most focused on the following current and emerging operational resilience and cybersecurity threats to the banking sector.

- **Ransomware:** The frequency and severity of ransomware attacks continue to increase, targeting organizations of all sizes, including those in the financial sector. Malicious actors continue to pressure organizations to pay extortion demands in exchange for decrypting

sensitive data that have been encrypted or to prevent the release of sensitive information obtained during a cyberattack. The financial sector has also seen an increase in ransomware developers adopting a ransomware-as-a-service model, in which the developers of a ransomware strain allow other cyber criminals, known as affiliates, to use an administrator's malware to conduct attacks in exchange for a small, fixed cut of ransom proceeds.

- **DDoS:** DDoS attacks come in a variety of shapes and sizes and call for different mitigations to counter the wide variety of attacks. The FFIEC issued a joint statement in 2014 encouraging banks and their service providers to address DDoS readiness as part of ongoing information security and incident response plans.[54]
- **Account takeover:** Cyber criminals have used several ways to gain unauthorized access to, or otherwise take over, customer accounts. These attacks are becoming more sophisticated but still often rely on phishing to gain initial access and stolen credentials to perpetuate fraud. Stolen customer credentials may give an attacker access to customers' account information to commit fraud and identity theft. Stolen employee and third-party credentials may provide initial access to trusted internal systems. Similarly, business email compromise and similar tactics are used to send fraudulent payment instructions to financial institutions or other business associates, or to effect financial fraud. These schemes continue to grow and adversely affect financial institutions and their customers.
- **Supply chain risks:** Cyber criminals are increasingly exploiting vulnerabilities in widely used IT systems and services to conduct malicious cyber activities. In supply chain attacks, software designed to help maintain clients' systems and networks is compromised and used to spread malicious software, affecting thousands of customers. Victims of these attacks have included government agencies, financial sector entities, and service providers. Recent high-profile incidents demonstrate the importance of banks assessing the risks emanating from their suppliers and third parties and developing a comprehensive cooperative approach to operational resilience.
- **Geopolitical threats:** Increased geopolitical tensions highlight the importance of heightened threat monitoring, greater public-private sector information-sharing, and safeguarding against disruptive attacks targeting the financial sector. The OCC has worked with other agencies to develop and distribute information and resources on heightened risk from cybersecurity threats and mitigations. The OCC and other agencies continue to highlight CISA's efforts to promote awareness and mitigation of current cybersecurity threats on CISA's Shields Up web page.
- **Post-quantum cryptography:** Quantum computing is an emerging technology with security implications that could make current encryption technology ineffective. While broad implementation of quantum computing is unlikely to be available in the near term, banks and service providers should be aware of the risk implications and should consider how to effectively monitor developments in quantum computing as they manage future infrastructure investments.
- **Digital assets (including cryptocurrency):** Digital assets, specifically cryptocurrency, have experienced significant volatility and turmoil. On March 7, 2025, the OCC issued Interpretative Letter 1183 reaffirming the permissibility of certain crypto-asset activities (i.e., crypto-asset custody, holding deposits that serve as reserves backing stablecoins, and using distributed ledgers and related stablecoins to facilitate payments) and eliminating the

[54] Refer to OCC Bulletin 2014-14, "Distributed Denial-of-Service Cyber Attacks, Risk Mitigation, and Additional Resources: Joint Statement."

supervisory nonobjection process that previously applied to these crypto-asset activities. On May 7, the OCC issued Interpretive Letter 1184, which confirmed that banks (1) may buy and sell crypto-assets held in custody at the customer's direction in a manner consistent with the customer agreement and applicable law and (2) are permitted to use sub-custodians to provide crypto-asset custody services, subject to appropriate third-party risk management practices. As with all activities, banks must conduct crypto-asset activities in a safe, sound, and fair manner and in compliance with applicable law.[55]

- **AI:** The banking industry faces new fraud and cybersecurity related threats from attackers' use of AI. The use of AI has the potential to reduce costs and increase efficiencies; improve products, services, and performance; strengthen risk management; and expand access to and increase fairness in credit and other banking products and services. AI can also present challenges, including compliance and operational risks (e.g., fraud). Attackers have used AI to develop fraud-related schemes to amplify phishing, such as recent deepfake voice cloning tactics. Attackers are also using AI to develop new malware to attack systems.[56]

Current and emerging operational resilience and cybersecurity threats are communicated to OCC-supervised banks, service providers, and other stakeholders through a number of channels, including the *Semiannual Risk Perspective.*[57]

OCC resources monitor longer-term technology developments that may affect operational resilience and cybersecurity in the future. These emerging developments and technological advances can strengthen security or create new cybersecurity risks as malicious actors seek to exploit them. OCC subject matter experts, including Office of Financial Technology staff, monitor these longer-term developments and engage with stakeholders to assess their potential impact on the financial sector. Examples of these efforts are the interagency requests for information on digitalization[58] and for information on financial institutions' use of AI, including machine learning.[59] These requests included questions on how bank digitalization and the use of AI technologies may affect cybersecurity.

OCC Internal Security

The CSO's threat intelligence collection and response team continually monitors industry and federal threat intelligence sources, including the Treasury Department, CISA, and FS-ISAC, to identify emerging threats to the OCC. The CISO produces reports for the Comptroller and Executive Committee members, including the CRO, on current cybersecurity threats to the OCC identified by the CSO's 24/7/365 Cyber Defense Center. The OCC's Enterprise Risk Committee,

[55] Refer to OCC Bulletin 2025-2, "Bank Activities: OCC Issuances Addressing Certain Crypto-Asset Activities."

[56] Refer to the Federal Trade Commission (FTC) press release, "FTC Implements New Protections for Businesses Against Telemarketing Fraud and Affirms Protections Against AI-enabled Scam Calls," March 7, 2024.

[57] Refer to the OCC's *Semiannual Risk Perspective*.

[58] Refer to OCC Bulletin 2025-8, "Bank Activities: Request for Information on Community Bank Digitalization."

[59] Refer to OCC Bulletin 2021-17, "Artificial Intelligence: Request for Information on Financial Institutions' Use of Artificial Intelligence, Including Machine Learning."

which is chaired by the CRO and comprises senior agency leadership, continues to highlight cybersecurity as a key risk for the OCC as an organization. Threat trends include targeted phishing campaigns, ransomware, denial of service, and unauthorized access attempts by malicious actors,[60] which include nation-state actors that pose risk to the confidentiality, integrity, and availability of OCC information.

[60] On February 12, 2025, the OCC confirmed a security incident involving unauthorized access to a service account in its cloud-based office automation environment. That day, it disabled the compromised account and reported the incident to CISA, as required in OMB memorandum M-25-04. The OCC provided initial public notification in a news release published on its public website on February 26, 2025. After further investigation in consultation with Treasury, the OCC determined that the incident qualified as a "major incident" as defined in OMB memorandum M-25-04, and on April 8, 2025, notified Congress of such, and published a related news release on the agency's public website.

Since February 12 and as of the issuance of this report, the OCC has hardened its office automation environment and continues to implement additional response and reporting activities. Technical information on the nature of the attack and indicators of compromise has been shared via Treasury in an OCCIP circular, on the Project Fortress threat feed platform, and through FS-ISAC.

Appendixes

Appendix A: Cybersecurity Supervisory Guidance and Resources (2014–Present)

Organization	Date	Document type	Title	Description
OCC	May 5, 2025	Request for Information	OCC Bulletin 2025-8, "Bank Activities: Request for Information on Community Bank Digitalization"	Solicits comments on the key challenges and barriers faced by community banks in the adoption and implementation of digital banking solutions.
OCC	March 19, 2025	Resource	OCC Bulletin 2025-3, "Digitalization: Resources for Community Banks"	The OCC has established a new Digitalization page on www.occ.gov dedicated to resources to help community banks meet their digitalization objectives. This page highlights "Interagency Guidelines Establishing Information Security Standards."
FFIEC	August 29, 2024	Resource	OCC Bulletin 2024-25, "Cybersecurity: FFIEC Cybersecurity Assessment Tool Sunset Statement"	Highlights that the FFIEC will remove the cybersecurity assessment tool (CAT) from the FFIEC website on August 31, 2025.
OCC, FDIC, Federal Reserve Board	May 3, 2024	Guide	OCC Bulletin 2024-11, "Third-Party Relationships: A Guide for Community Banks"	Designed to assist community banks when developing and implementing their third-party risk management practices and provides potential considerations, resources, and examples through each stage of the third-party risk management life cycle.
OCC	June 26, 2023	Work program	OCC Bulletin 2023-22, "Cybersecurity: Cybersecurity Supervision Work Program"	Highlights the CSW for use by OCC examiners.
OCC, FDIC, Federal Reserve Board	June 6, 2023	Guidance	OCC Bulletin 2023-17, "Third-Party Relationships: Interagency Guidance on Risk Management"	Replaces the OCC's third-party risk management guidance from 2013 and is directed to all banking organizations supervised by the federal banking agencies.
FFIEC	October 6, 2022	Resource	OCC Bulletin 2022-22, "Cybersecurity: 2022 Cybersecurity Resource Guide for Financial Institutions"	Provides a list of voluntary programs and actionable initiatives that are designed for or available to help financial institutions meet their security control objectives and prepare to respond to cyber incidents.
OCC	March 29, 2022	Bulletin	OCC Bulletin 2022-8, "Information Technology: OCC Points of Contact for Banks' Computer-Security Incident Notifications"	Provides OCC points of contact that banking organizations may use to satisfy the notification requirement in 12 CFR 53.

Organization	Date	Document type	Title	Description
FFIEC	August 11, 2021	Joint statement	OCC Bulletin 2021-36, "Information Security: FFIEC Statement on Authentication and Access to Financial Institution Services and Systems"	Describes significant risks associated with the cybersecurity threat landscape and the importance of banks effectively authenticating users and customers. The guidance recognizes that authentication considerations extend beyond customers to include employees, third parties, and system-to-system communications.
OCC, FDIC, Federal Reserve Board	August 7, 2021	Guide	OCC Bulletin 2021-40, "Third-Party Relationships: Conducting Due Diligence on Financial Technology Companies: A Guide for Community Banks"	Supports responsible innovation within the federal banking system by providing community banks with information that may be relevant when conducting due diligence on financial technology companies.
OCC, FDIC, Federal Reserve Board	October 30, 2020	Sound practices	OCC Bulletin 2020-94, "Operational Risk: Sound Practices to Strengthen Operational Resilience"	Provides firms with ways to strengthen their operational resilience in the face of internal and external operational risks that, left unchecked, could lead to a widespread disruption.
FFIEC	April 30, 2020	Joint statement	OCC Bulletin 2020-46, "Cybersecurity: Joint Statement on Security in a Cloud Computing Environment"	Addresses use of cloud computing services and security risk management principles in the financial services sector.
OCC, FDIC	January 16, 2020	Joint statement	OCC Bulletin 2020-5, "Cybersecurity: Joint Statement on Heightened Cybersecurity Risk"	Reiterates sound cybersecurity risk management principles.
FFIEC	November 5, 2018	Joint statement	OCC Bulletin 2018-40, "Cybersecurity: Cyber-Related Sanctions"	Alerts financial institutions to actions taken by the Treasury Department's Office of Foreign Assets Control under its Cyber-Related Sanctions program and to the potential impact that sanctions may have on financial institutions' operations, including the use of services of a sanctioned entity.
FFIEC	April 11, 2018	Joint statement	OCC Bulletin 2018-8, "Cyber Insurance: FFIEC Joint Statement on Cyber Insurance and Its Potential Role in Risk Management Programs"	Provides awareness of the potential role of cyber insurance in financial institutions' risk management programs.
FFIEC	May 2017	Resource	Cybersecurity Assessment Tool	Provides a repeatable, measurable process for financial institutions to measure their cybersecurity preparedness over time. The CAT incorporates cybersecurity-related principles from the *FFIEC IT Examination Handbook,* regulatory guidance, and concepts from other industry standards, including the

Organization	Date	Document type	Title	Description
				NIST CSF. Using the CAT is voluntary for financial institutions. The OCC has incorporated its use into the agency's supervision program.
FFIEC	June 7, 2016	Joint statement	OCC Bulletin 2016-18, "Cybersecurity of Interbank Messaging and Wholesale Payment Networks: FFIEC Statement"	Reminds financial institutions of the importance of actively managing the risks associated with interbank messaging and wholesale payment networks.
FFIEC	November 3, 2015	Joint statement	OCC Bulletin 2015-40, "Joint Statement on Cyber Attacks Involving Extortion"	Notifies financial institutions of the increasing frequency and severity of cyberattacks involving extortion.
FFIEC	March 30, 2015	Joint statement	OCC Bulletin 2015-20, "Cybersecurity: Destructive Malware Joint Statement"	Notifies financial institutions of the increasing threat of cyberattacks involving destructive malware and recommends risk mitigation techniques.
FFIEC	March 30, 2015	Joint statement	OCC Bulletin 2015-19, "Cybersecurity: Cyber Attacks Compromising Credentials Joint Statement"	Addresses growing trend of cyberattacks to obtain online credentials for theft, fraud, or business disruption and recommends risk mitigation techniques.
FFIEC	November 3, 2014	Joint statement	OCC Bulletin 2014-53, "Cybersecurity: Cybersecurity Assessment General Observations and Statement"	Recommends that participating in information-sharing forums is an important element of an institution's risk management processes and its ability to identify, respond to, and mitigate cybersecurity threats and incidents.

Appendix B: Key Examination Booklets

Organization	Title	Description
OCC	*Comptroller's Handbook*	The OCC *Comptroller's Handbook* is prepared for use by OCC examiners in connection with their examination and supervision of national banks, federal savings associations, and federal branches and federal agencies of foreign banking organizations (collectively, banks). Each bank is different and may present specific issues. Accordingly, examiners should apply the information in the booklets consistent with each bank's individual circumstances. Topics focus on the following: • Examination Process • Safety and Soundness – Capital Adequacy – Asset Quality – Management – Earnings – Liquidity – Sensitivity to Market Risk – Other Activities • Asset Management • Consumer Compliance • Securities Compliance
FFIEC	*FFIEC IT Examination Handbook*	The *FFIEC IT Examination Handbook* comprises multiple booklets addressing • Architecture, Infrastructure, and Operations • Audit • Business Continuity Management • Development, Acquisition, and Maintenance • Information Security • Management • Outsourcing Technology Services • Retail Payment Systems • Supervision of Technology Service Providers • Wholesale Payment Systems

Appendix C: Examples of Domestic and International Interagency Organizations in Which the OCC Participates

Organization	Key cybersecurity-related subgroups	Description
BCBS	• Operational Resilience Group • Financial Technology Group • Supervision Cooperation Group • Policy and Standards Group	The BCBS is the primary global standard setter for the prudential regulation of banks and provides a forum for regular cooperation on banking supervisory matters. Its 45 members comprise central banks and bank supervisors from 28 jurisdictions.
FBIIC	Not Applicable	In the wake of the attacks on September 11, 2001, the FBIIC was created to focus on three areas: • Improving coordination and communication among financial regulators. • Enhancing the resiliency of the financial sector. • Promoting public-private partnership. FBIIC members have collaborated since then to advance the committee's mission. These efforts are designed to strengthen the security and resiliency of critical infrastructure not only within the financial services sector, but also for the financial institutions regulated or supervised by the FBIIC member organizations.
FFIEC	• Task Force on Supervision • Information Technology Subcommittee • Cybersecurity and Critical Infrastructure Subcommittee	The FFIEC was established on March 10, 1979, pursuant to title X of the Financial Institutions Regulatory and Interest Rate Control Act of 1978 (FIRA), Public Law 95-630. The council is a formal interagency body empowered to prescribe uniform principles, standards, and report forms for the federal examination of financial institutions by the Federal Reserve Board, FDIC, the National Credit Union Administration, OCC, and the Consumer Financial Protection Bureau and to make recommendations to promote uniformity in the supervision of financial institutions. To encourage the application of uniform examination principles and standards by the state and federal supervisory authorities, the FFIEC established, in accordance with the requirement of the statute, the State Liaison Committee (SLC) composed of five representatives of state supervisory agencies. In accordance with the Financial Services Regulatory Relief Act of 2006, the Chair of the SLC was added as a voting member of the FFIEC in October 2006.
FSB	• Cyber Incident Reporting Working Group	The FSB promotes international financial stability by coordinating national financial authorities and international standard-setting bodies as they work toward developing strong regulatory, supervisory, and other financial sector policies. The FSB fosters a level playing field by encouraging coherent implementation of these policies across sectors and jurisdictions.

Organization	Key cybersecurity-related subgroups	Description
Senior Supervisors Group (SSG)	• Cybersecurity and Operational Resilience Working Group	The SSG is a forum for senior representatives of supervisory authorities to engage in dialogue on risk management practices, governance, and other issues concerning complex, globally active financial institutions. The group is composed of senior executives from the bank supervisory authorities of those institutions' home jurisdictions. The SSG uses the network to share information on supervisory approaches and engages with the financial services industry to better understand new challenges and emerging risks that systemically important institutions face.

Appendix D: Abbreviations

AI	artificial intelligence
BCBS	Basel Committee on Banking Supervision
BSE	Bank Supervision and Examination
BSP	Bank Supervision Policy
CAT	Cybersecurity Assessment Tool
CESG	Cloud Executive Steering Group
CIO	Chief Information Officer
CIRC	Cyber Incident Reporting Council
CIRCIA	Cyber Incident Reporting for Critical Infrastructure Act of 2022
CISA	Cybersecurity and Infrastructure Security Agency
CISO	Chief Information Security and Chief Privacy Officer
CISSP	Certified Information Systems Security Professional
CNBE	Chief National Bank Examiner
CRO	Chief Risk Officer
CSF	Cybersecurity Framework
CSO	Cyber Security Office
CSW	Cybersecurity Supervision Work Program
DHS	Department of Homeland Security
DDoS	distributed denial of service
FBIIC	Financial and Banking Information Infrastructure Committee
FDIC	Federal Deposit Insurance Corporation
FFIEC	Federal Financial Institutions Examination Council
FISMA	Federal Information Security Modernization Act of 2014
FSB	Financial Stability Board
FS-ISAC	Financial Services Information Sharing and Analysis Center
FSSCC	Financial Services Sector Coordinating Council
GAO	U.S. Government Accountability Office
IT	information technology
MRA	matters requiring attention
NIST	National Institute of Standards and Technology
OCC	Office of the Comptroller of the Currency
OCCIP	Office of Cybersecurity and Critical Infrastructure Protection
OIG	Office of the Inspector General
OMB	Office of Management and Budget
SSG	Senior Supervisors Group
SLC	State Liaison Committee
SyRIS	Systemic Risk Identification and Support
URSIT	Uniform Rating System for Information Technology