

From: [Clark Hervert](#)
To: [PRAINFO](#)
Subject: FFIEC CYBERSECURITY ASSESSMENT TOOL
Date: Friday, January 08, 2016 1:40:27 PM

Legislative and Regulatory
Activities Division, Office of the
Comptroller of the Currency,
Attention: 1557-0328,

RE: comment on FFIEC CYBERSECURITY ASSESSMENT TOOL

I would totally agree that the amount of time needed to complete the Tool is much larger for bank of our size, \$100,000,000.00. Bear in mind that we must wear several hats in a small bank and that distracts from completing just one task, like completing the Tool. I, as in most small banks, wear many hats such as branch manager, lending officer, director, compliance officer, and cyber-officer. So the Tool fell to me to complete. These other duties require much time and effort already, and distract from completing an "optional" exercise such as the Tool. I would estimate that I have spent 200-300 hours of entering responses into the Tool, gathering data and input from other staff and sources, while squeezing these activities into a very busy schedule over the past 6 months. I am not yet completely finished with the Tool. Much of the data entered thus far is estimates or educated guesses since we are a very small bank and do not have hard data on many of the areas of cyber risk being monitored on an ongoing basis. This means that we have to generate the data or estimate first, then digest it, and then use it to respond in the Tool.

When complete, the Tool will no doubt point out many areas in the bank that will need attention. Again, with limited staff, we will struggle to deal with all of the areas that the Tool identifies as needing attention. The Tool is a very large time consuming task for a bank our size. I fear that our examiners will ask for the completed Tool at the next exam and if we have not completed one, they will request that we generate the same amount and type of data that the Tool requires anyway. If we do compete the Tool and it points to areas needing attention, whether valid or not due to our size scale, and we (I) have not address those areas then we will have an even larger task to justify our actions or inactions.

Thank you.

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