



IDAHO

DEPARTMENT OF FINANCE

BRAD LITTLE
Governor

PATRICIA R. PERKINS
Director

TO: Idaho State-Chartered Credit Unions

FROM: Patricia R. Perkins, Director
Idaho Department of Finance

SUBJECT: Information Technology

DATE: February 3, 2025

The purpose of this notice is to inform you of an upcoming change in the manner in which the Idaho Department of Finance (Department) will assign ratings for certain Idaho state-chartered credit unions at examinations. Specifically, for credit unions with total assets at or above \$50 million as of the most recent year-end period, the Department will assess “Information Technology” within its own component rating (“IT”) rather than as a factor within the “Management” or “M” component rating. The IT rating will conform to the enclosed composite IT rating definitions from the Uniform Rating System for Information Technology (URSIT). This change will go into effect for all examinations commencing after January 1, 2026.

The URSIT rating system was approved by the Federal Financial Institutions Examination Council (FFIEC) in 1978 and, shortly after that time, the IT rating system was adopted by all Federal supervisory agencies that comprise the FFIEC with the exception of the NCUA. The URSIT rating system is used to uniformly assess and rate IT-related risks of financial institutions. The rating system is used to evaluate the examined institution’s overall risk exposure and risk management performance and determine the degree of supervisory attention necessary to ensure weaknesses are addressed and risks are effectively managed. The assigned rating determines the degree of supervisory attention necessary.

While the “IT” composite rating will now be separately reported, supervisory expectations for the management of IT risk, including cybersecurity preparedness, remain unchanged. The ability of management to identify, measure, monitor, and control technology-related risks should be commensurate with the credit union’s size, complexity, and risk profile. The separation of the “IT” component does not imply a requirement to develop enhanced management systems where IT risk is already effectively identified, measured, monitored, and controlled.

Please consider sound guidance from the FFIEC IT Handbooks when developing, implementing, and maintaining administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of member information. The FFIEC IT Handbooks can be found at the following link: <https://ithandbook.ffiec.gov/>.

DIRECTOR’S OFFICE

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If you have any questions or concerns, or wish to discuss this matter, please contact our office.

Sincerely,



Patricia R. Perkins

Director

PRP/

Enclosure

cc: National Association of State Credit Union Supervisors

National Credit Union Administration

American Share Insurance
