



CERTIFICATION NEWS

REGULATORY COMPLIANCE

Measuring the High Cost of Web Malware Protection

By Greg Maudsley

A ransomware attack is terrible for consumers, employees and businesses—and you can put a price tag on recovery.

According to FBI's report in April 2016, "cyber-criminals collected \$209 million in the first three months of 2016 by extorting businesses and institutions to unlock computer servers," as reported by CNN. A typical ransomware might demand a payment of \$10,000 or more, such as how the Hollywood Presbyterian Medical Center forked over \$17,000 in February.



Just as importantly, the costs of recovering from a ransomware or other cyberattack are well understood ... but how much should an organization spend to prevent one in the first place?

Community banks accept that they have to invest in cyber-protection. The bad news is that it is difficult to judge if they are spending wisely, not overspending out of fear. The good news is that there are ways to spend smarter, getting a better security posture while also reducing expenditures. Let's get into that shortly, but first, let's look at one of the biggest attack surfaces facing modern businesses: websites that can deliver malware, including ransomware.

Havoc on the Web

Websites are one of the most common malware vectors (along with malicious emails)

See [Malware Protection](#), page 2

PROFESSIONAL PROFILE

Get to Know Debbie Robertson, an ICBA Certified Banker in Minnesota

By Runay Olson

Debbie Robertson is vice president compliance and Bank Secrecy Act officer at Grand Rapids State Bank in Grand Rapids, Minn. She became a Certified Community Bank Internal Auditor in 2006, a Certified BSA/AML Professional in 2008, a Certified Community Bank Compliance Officer in 2009 and a Certified Commercial Loan Officer in 2012 through ICBA's certification programs

See [Profile](#), page 3

Fact Check

Grand Rapids State Bank

Headquarters: Grand Rapids, Minn.

Retail offices: Two locations in Grand Rapids

Bank asset size: \$225 million

Number of bank employees: 54

Number of staff in auditing and BSA/AML: One

Website: www.grsb.com

Taglines/Motto: Responsibly Building Your Future

Audit Institute (Week 1)

- April 24-28; Kansas City
- Sept. 11-15; Minneapolis

Audit Institute (Week 2)

- May 1-5; Kansas City
- Sept. 18-22; Minneapolis

Annual Current Issues/ Certification Conference

- Sept. 25-28; Minneapolis
- Oct. 23-26; Baltimore

Bank Security Institute

- Sept. 10-13; Minneapolis

BSA/AML Institute

- May 17-19; Minneapolis
- July 31-Aug. 2; Chicago
- Nov. 13-15; San Diego

Community Bank IT Institute

- May 8-12; Phoenix
- Aug. 7-11; Minneapolis

Compliance Institute

- Feb. 26-Mar. 3; Dallas
- June 11-16; Baltimore
- Oct. 1-6; Minneapolis

Consumer Lending Institute

- Sept. 17-20; Minneapolis

Commercial Lending Institute

- Nov. 5-10; Minneapolis

Community Bank Marketing Institute (NEW)

- Aug. 16-18; Minneapolis

Credit Analyst Institute

- April 2-5; Minneapolis
- Aug. 20-23; Nashville

Web Malware Protection *Continued from page 1*

that can provide the entry point to many other types of hack attacks. Block access to the Web, and you've made a dent in overall cybersecurity risks.

There are more than 550 million malware variants, reports AV-TEST, with more than 390,000 new malicious programs being identified every day. There are multiple ways malware gets into an end-user's computer—and from there, the malware might have unfettered access to everything on that computer and other resources on the business network. In many cases the end user did absolutely nothing wrong ... but became infected anyway. Blocking access to these uncategorized sites reduces the chances of malware infection, but introduces a number of problems and hidden costs, such as more help-desk tickets.

Here are several potential problems with allowing access to uncategorized sites:

- **Risk:** The risk of malware from allowing access to uncategorized sites is significant. A large Fortune 50 financial services institution tasked its security research team to analyze the sources of malware infections for three months. Its internal report showed that more than 60 percent of the infections were from uncategorized sites. These infections are costly given that a large enterprise can spend an average of almost 600 hours each week on malware containment. Considering \$82 per SOC-engineer-hour X 52 weeks X 600 hours per week, that's more than \$2.5 million spent annually on that one task.
- **Cost of sanitizing infected machines:** Sanitizing infected machines can be quite costly. A large service provider in Asia was forced to re-image and average of eight end-point devices each week because it no longer believed it could successfully disinfect machines using traditional antivirus solutions. An internal analysis showed that this practice cost the service provider \$3 million to \$4 million per year in IT and productivity costs.
- **SOC costs:** Allowing uncategorized sites means more security alerts. In Japan, and most regulated industries

across the globe, every alert from every security product has to be fully analyzed for possible endpoint compromise. According to the Ponemon Institute, two-thirds of the time spent by security staff responding to malware alerts is wasted because of faulty intelligence. It costs organizations an average of \$1.27 million annually in time wasted responding to erroneous or inaccurate malware alerts.

- **SOC turnover:** The average employment term of SOC engineers is roughly a year, after which they resign due to alert-fatigue—that is, they are simply overwhelmed by the repetitive work of responding to all those security alarms. Recruiting costs in this area are high, as it is increasingly difficult to hire qualified SOC engineers. This is because new college graduates in computer science are more compelled to build apps rather than learn security and forensics, a career path with a steep learning curve and a high-degree of expertise required to make sense of the complexities.

Looking at it another way: Blocking uncategorized sites prevents users from accessing legitimate content, which compromises productivity and generates requests for re-classification of blocked content. Meanwhile, allowing access to uncategorized sites means more malware and phishing attacks reach users, which can lead to breaches and significant losses via data theft and fraud. In addition to user issues, it is very costly (often impossible) for IT staff to chase all alerts generated by unclassified sites, resulting in high costs and reduced security. You just can't win with a traditional approach.

Isolation strategy

Isolation technology, by its nature, doesn't open websites on the end-user desktop, notebook or mobile device, but rather opens websites in a secure virtual container on a cloud-based platform. The end user interacts with the site through technology that renders a user experience that is indistinguishable from direct access. By executing sessions away from the endpoint and delivering

only safe-rendering information to devices, users are protected from malware and malicious activity.

Malware has no path to reach an endpoint, and legitimate content needn't be blocked in the interest of security. Administrators can open up more of the Internet to their users while simultaneously eliminating the risk of attacks,

Isolation puts an end to their costly no-win situation:

- **Risk:** No active Web content reaches the endpoint, thus uncategorized sites present zero risk.
- **Cost of sanitizing infected machines:** Isolation eliminates the Web as a malware threat vector, drastically reducing number of machines to be reimaged. Reduces the urgency around patching machines for every browser and plug-in vulnerability.
- **SOC costs:** Isolation stops threats before they are detected by traditional solutions, eliminating erroneous or inaccurate malware alerts.
- **SOC turnover:** Alert fatigue is minimized along with SOC staff turnover.
- **Number of Trouble Tickets:** Employees are more productive and are free to safely explore the Web without submitting recategorization requests.

Meanwhile, no software needs to be installed on the end-user's desktop, notebook or mobile devices—not only saving IT time and money, but also eliminating concerns about keeping end-user software up-to-date.

With more than 550 million malware variants, and hundreds of thousands of new malware being discovered every day, the traditional approach to malware detection has many hidden costs—in time, in talent and in staffing, as well as the cost of buying and maintaining security products.

Greg Maudsley (greg.maudsley@menlosecurity.com) is senior director of product marketing at Menlo Security, a cybersecurity software provider in Menlo Park, Calif.

What makes a community bank different from the largest banks?

Robertson: Community banks focus their services around the consumers and small businesses within their community, as well as their surrounding communities. The large banks focus their services around large corporations all over.

What makes you most proud about your bank?

Robertson: Grand Rapids State Bank is committed to developing meaningful relationships with their customers and within the community. They truly care about their customers and strive to offer top-notch service, personalized care, community leadership and comprehensive banking solutions.

How did you find your way into banking?

Robertson: I joined Grand Rapids State Bank in 2001 after taking a year off working for my previous employer for 9½ years. Almost immediately after I decided that being unemployed was not for me, I heard that Grand Rapids State Bank was hiring, so I applied and was hired to work in the item processing department. I have held a few different positions here, but have been in my current compliance position for the past 12 years and have not regretted it.

Tell us your biggest and best accomplishment.

Robertson: My biggest accomplishment is getting to where I am today. I think it is important to note that I don't know everything there is to know about compliance and banking, but I do know where to find the information I need, and I have external support that I can call on for a second opinion. One thing I have learned in my time working in the banking world is that it is very easy to get bogged down in details. Participating in the ICBA certification programs has helped take me "out of the box" and really understand the universe I work in and what my core responsibilities are as they relate to banking.

What do you like best about the work you do?

Robertson: Wow, this could be a trick question in my profession, because not everyone can put "like" and "compliance" in the same sentence and expect to be taken seriously. I like compliance. It is a very challenging, dynamic and always evolving area. I could almost say that I have job security, as the demand for experienced compliance professionals currently outweighs the supply. New rules and regulations evolve on seemingly a daily basis, so the work stays fairly fresh. Although very challenging, I don't mind that it is always changing.

I really like what I do and I have some pretty awesome coworkers who respect what I do as the compliance officer, so that makes it even more rewarding. My job keeps me motivated and dedicated to getting the job done.

What is your bank's customer-service philosophy?

Robertson: Grand Rapids State Bank is dedicated to providing responsible banking, by delivering quality services to our customers and the community in a professional manner.

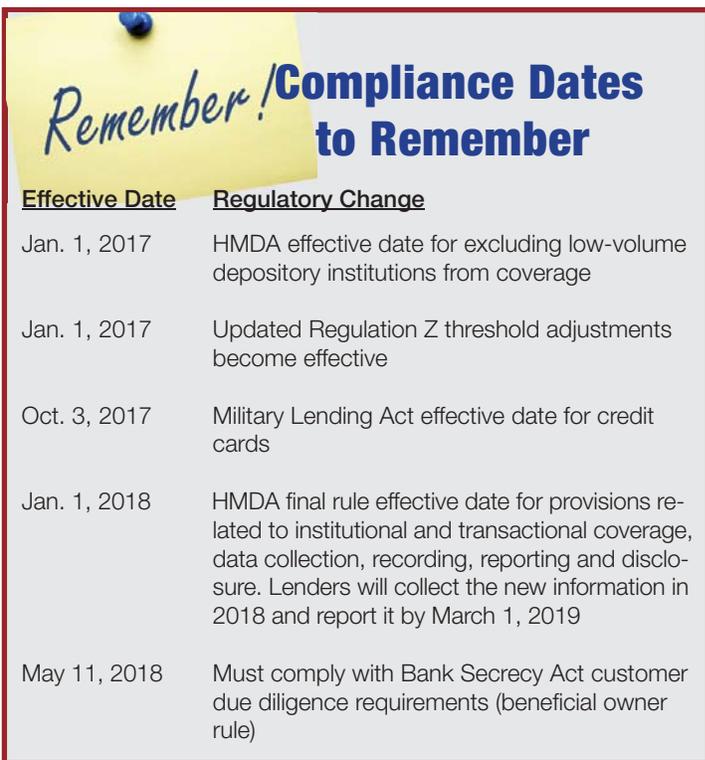
What's your best advice to a new bank employee?

Robertson: A stress-free, enjoyable workday is a key step to-

ward a productive employee. One major reason why employees are stressed at work is a lack of confidence in their jobs. Don't be worried that you are doing something wrong or overlooking an important step, because if you are, you may lose focus, your morale drops and your bottom-line performance suffers.

No matter what your new banking position is, be confident in yourself. Remember that you were not selected to fill a particular position. Believe that you were chosen for your position because they believe you will bring value by bringing something new to the table. If you are bright and motivated, then you can think of ways you can contribute to the success of the business.

Runay Olson (runay.olson@icba.org) is vice president, education seminars, Community Banker University at ICBA.



<u>Effective Date</u>	<u>Regulatory Change</u>
Jan. 1, 2017	HMDA effective date for excluding low-volume depository institutions from coverage
Jan. 1, 2017	Updated Regulation Z threshold adjustments become effective
Oct. 3, 2017	Military Lending Act effective date for credit cards
Jan. 1, 2018	HMDA final rule effective date for provisions related to institutional and transactional coverage, data collection, recording, reporting and disclosure. Lenders will collect the new information in 2018 and report it by March 1, 2019
May 11, 2018	Must comply with Bank Secrecy Act customer due diligence requirements (beneficial owner rule)

Please report any CPE credits that you have completed throughout the year and pay your 2016 Annual Certification Renewal Fee.

To Access Your Online Portfolio:

1. Navigate to www.icbacertification.org
2. Enter your Username (Email Address) and Password
3. Report CPE Credits Accumulated in 2016
4. Pay your 2016 Annual Certification Renewal Fee
5. To pay your fee, click on the underlined link in the portfolio. Select the invoice you wish to pay and click "View Details" where you can choose to "Print Invoice" or "Add to Cart" and pay the invoice online.

Certification Programs – We’re Answering Your Frequently Asked Questions!

ICBA/Community Banker UniversitySM offers eight certification programs. The certification programs are nationally recognized, professional designations and require the user to follow specific processes and procedures before a certification is granted. These programs are governed and monitored by the ICBA Certification Board, which is made up of leadership bankers from the ICBA Bank Education Committee, certified community bankers, attorneys and ICBA certification program instructors.

What certification programs does ICBA/Community Banker University offer?

Certification programs are offered through Community Banker University’s institutes. The following certification programs are currently offered:

- Auditing – Certified Community Bank Internal Auditor (CCBIA)
- Bank Security – Certified Community Bank Security Officer (CCBSO)
- BSA/AML – Certified BSA/AML Professional (CBAP)
- Commercial Lending – Certified Commercial Lending Officer (CCLO)
- Compliance – Certified Community Bank Compliance Officer (CCBCO)
- Consumer Lending – Certified Community Bank Consumer Lender (CCBCL)
- Credit Analysis – Certified Community Bank Credit Analyst (CCBCA), and
- Information Technology – Certified Community Bank Technology Officer (CCBTO).

What is the difference between a certificate and a certification program?

Certification programs have ongoing continuing education requirements. All of our programs have continuing education requirements and therefore qualify as ICBA certification programs.

What do I need to do to achieve a certification?

To achieve a certification, participants must:

- Attend an institute in its entirety;
- Participate in all assigned case studies, small group work, presentations; and
- Successfully pass all exams given during an institute with a score of 70 percent or higher.

Learners who want to achieve the Certified Community Bank Technology Officer and the Certified Commercial Lending Officer designations must also complete in-class case studies and case study presentations held on the last day of Information Technology and Commercial Lending Institutes.

What happens if I don’t comply with the certification requirements?

Participants who fail to comply with the certification procedures will not receive a certification.

Can I attend an institute even if I don’t want to become certified?

Yes, bankers can attend the institutes without obtaining a certification. Certification is optional. In fact, many community bankers elect to attend an institute both in preparation to work toward full certification in the future or to obtain Continuing Professional Education (CPE) credits.

What is the cost to become certified?

Certification requires successful registration for the Institute and payment of the respective testing fees. Each certification has testing fees associated with it. The table shows the fees for each available certification.

Certification	ICBA Members	Non-members
Auditing	\$150/week	\$250/week
Bank Security	\$100	\$200

BSA/AML	\$100	\$200
Commercial Lending	\$100	\$200
Compliance	\$250	\$350
Consumer Lending	\$100	\$200
Credit Analyst	\$100	\$200
Information Technology	\$150	\$250

How many weeks of Institute attendance does the auditing certification require?

The Audit Institute is two weeks in length. You need to attend both weeks to obtain the auditing certification. There are three exams in each of the two weeks, for a total of six exams.

Do I have to take both weeks for the auditing certification during consecutive calendar weeks?

Not necessarily. You have a few options when taking the auditing certification:

- Take both weeks together either in the fall or the spring;
- Take Week One in the spring and Week Two in the fall; or
- Take Week One in the fall and Week Two in the spring.

However, you must complete both weeks and take all exams within a two-year period to complete the auditing certification requirements.

How do I keep my certification current?

To keep a certification current, bankers need to complete the applicable CPE-credits every two years.

Thirty (30) CPE credits are required every two years for the following certifications:

- Auditing – Certified Community Bank Internal Auditor (CCBIA),
- Commercial Lending – Certified Commercial Loan Officer (CCLO),
- Compliance – Certified Community Bank Compliance Officer (CCBCO), and

- Information Technology – Certified Community Bank IT Officer (CCBTO).

Fifteen (15) CPE credits are required every two years for these certifications:

- BSA/AML – Certified BSA/AML Professional (CBAP),
- Bank Security – Certified Community Bank Security Officer (CCBSO),
- Consumer Lending – Certified Community Bank Consumer Lender (CCBCL), and
- Credit Analysis – Certified Community Bank Credit Analyst (CCBCA).

When do I need to start accumulating CPE credits?

All certification CPE requirements start the year following certification. For example, if you receive your certification in 2016, the CPE requirement starts on Jan. 1, 2017, so you will need to accumulate the required 15 or 30 CPE credits by Jan. 1, 2019 (two years from 2017).

How do I keep track of my CPE credits?

Certified bankers will be given access to set up an Online Certification Portfolio. This is a password protected area of the ICBA website. In this portfolio you can enter your CPE credits, download copies of certificates of attendance, registrations and agendas. This is also where you can pay the required annual renewal fee.

What training counts toward my certifications?

Certified bankers may accumulate up to 50 percent of the required CPE credits through online training courses and webinars. The other 50 percent of the required CPE credits must be accumulated through on-site education training programs. Community Banker University offers a wide selection of CPE programs, and other well-known bank training programs are also accepted for CPE credits.

Can I use CPE credits toward more than one certification?

No. Bankers with more than one certification cannot use their CPE credits

toward more than one certification. For example, a banker with an auditing certification and compliance certification will need to get 30 hours of CPE for each designation, a total of 60 hours of CPE training every two years.

I have the BSA/AML certification. Can I use any CPE credits?

Bankers with the CBAP certification must accumulate their CPE credits in topics related only to the BSA/AML requirements. Due to its specialty area of expertise, all certified CBAP persons will be required to maintain current and timely knowledge of BSA/AML events through ongoing CPE.

How does ICBA/Community Banker University determine the number of CPE credits for each course reported?

ICBA/Community Banker University adheres to the NASBA Statement on Standards for Continuing Professional Education Programs. To calculate total CPE credit, determine the total number of instructional minutes and divide by 50. Fifty minutes of participation in an instructed event is considered one CPE credit for each program of learning.

How long does it take for CPE earned and submitted into my portfolio to be approved?

We understand that your CPE submission is very important. For that reason, ICBA staff works as quickly as possible to review and approve all CPE requirements on an ongoing basis. If you have questions related to a specific CPE submission, please call the Community Banker University staff at 800-422-7285.

What happens if I don't meet my CPE credit requirement?

If you don't meet your CPE credit requirement within the two-year period, your certification status will lapse and you will no longer be certified through ICBA/Community Banker University. Community Banker University staff will notify bankers whose certification status has lapsed before the certification designation is removed.

What is the annual renewal fee?

The certification annual renewal fee is \$100. ICBA sends notice of renewal fee payments due during the fall of each year to all certified bankers.

Does the annual renewal fee apply to each certification I hold?

Yes, the annual renewal fee applies to each certification a banker holds. For example, a banker with two certifications would pay \$200 fee, or \$100 for each of the two certifications.

What happens if I don't pay the annual renewal fee?

Your certification status will lapse, and you will no longer be certified. Community Banker University staff will notify bankers whose certification status has lapsed before the certification designation is removed.

My certification lapsed two years ago. What do I do to get recertified?

If your certification lapsed two years ago or more, you must repeat the institute and retake the required exam(s).

I have a special request regarding a certification, what can I do?

All special requests and considerations must be submitted in writing to the Certification Board. The board is comprised of bankers, certification program instructors, attorneys, industry experts, consultants and ICBA staff. The board meets twice a year.

Is there a maximum number of participants in each certification program?

Yes. For the Credit Analyst Institute, we limit the number of participants to 50 students for each program. Due to the subject and nature of the class and small group work, the maximum learning environment is limited to 50 students.

Have additional questions? Community Banker University staff members are happy to assist you. Contact us at (800) 422-7285.



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 RETURN SERVICE REQUESTED

(NEW) BSA/AML Training Series

Updated Bank Secrecy Act/anti-money laundering training series of DVDs are a must have for compliance training. Regulatory expectations continue to be high and new trends are emerging faster than ever before. Stay compliant with the BSA/AML requirements!

BSA/AML for the Board of Directors and Senior Management (26 minutes)

- Your role in the success of your bank's BSA Program.
- Common challenges and strategies to mitigate them.
- Emerging industry trends and program updates.

BSA/AML for Lenders & Lending Staff (33 minutes)

- Outline of BSA/AML requirements.
- Lending red flags and new trends.
- Customer due diligence and enhanced due diligence.
- OFAC revisited.

BSA/AML for Frontline & Operations Staff (53 min.)

- Outline of BSA/AML requirements applicable to front-line and operations employees.
- Importance of the four pillars of a BSA/AML Program.
- Red flags to watch for in daily work activities.
- Examples and case studies.

BSA/AML for BSA Officers & Staff (63 minutes)

- Principles of BSA/AML and risk assessment.
- Overview of the customer due diligence final rule.
- CIP and prepaid cards.
- Emerging issues, trends and enforcement actions.

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ICBA Member —	\$179	\$539	ICBA Member —	\$179	\$539
Nonmember —	\$279	\$939	Nonmember —	\$279	\$939
BDP Participant —	\$159	\$499	BDP Participant —	\$159	\$499

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