Depository Division
Advisory Letter 2025-03
September 15, 2025

To: **All Credit Union Managers, Presidents, and Chief Executive Officers**
From: **Christopher C. Dietz, Deputy Director – Depository Institutions**

Re: **Indiana Department of Financial Institutions Implementation of the Federal Financial Institutions Examination Council Uniform Rating System for Information Technology**

Information technology and accompanying cybersecurity risks are some of the most prevalent and evolving risks that financial institutions assess and mitigate. A failure to prevent and/or respond to an information technology failure could tremendously impact a financial institution's ability to service members, maintain records, ensure confidentiality, and preserve trust with its stakeholders. Rightfully, in recent years, we have seen many financial institutions take the necessary steps to progress their information technology risk management maturity level and deploy resources to keep up with the changing landscape. Unfortunately, bad actors will require all of us to continue moving forward and not maintain a stagnant state.

Over the past eight years, the Department has hired staff with educational, industry, and certification-based experience in information technology and built an examination program designed to assist financial institutions in meeting a baseline risk management maturity level. With the cyber-risk environment constantly changing, it is also time for the Department to evolve our program. In an internal project, the Department is identifying ways to adjust our Information Technology examination practices to better identify risks unique to each financial institution and operating environment; look deeper into technical controls as opposed to focusing heavily on policy/procedure documentation; determine where we can have better insight into managed service providers and technology service providers; better match our examination activities with our resources, and deliver our work in a more transparent and efficient manner.

As a part of the Department's refocus of IT examination activities to provide more efficient reviews and more meaningful results to our financial institutions, examinations starting after March 30, 2026, will incorporate the Federal Financial Institutions Examination Council's (FFIEC's) Uniform Ratings System for Information Technology (URSIT) that has been consistently used by Federal and State regulatory agencies since the late 1990s. Examinations of national and Indiana state-chartered banks have included this rating program for decades, and many state credit union agencies across the country use the URSIT rating system to provide a transparent view of the examination's assessment of IT risk management. Additionally, during the Department's most recent NASCUS accreditation review, NASCUS identified the assessment of URSIT ratings as a recommended improvement in examination practices for the Department. The rating system, outlined in Appendix A, provides for a standalone rating assessment of the important components of the information technology environment. While the expectations from an examination standpoint will not change because of this rating system, the URSIT rating scale will provide better clarity to our financial institutions on areas where they excel and where improvements could be made, rather than having a vague statement on IT risk management buried under the Management component rating comment. As it is today, your overall IT/cybersecurity posture will still factor into our overall assessment of financial institution risk.

The URSIT is a comprehensive framework that centers on the risk evaluation of four critical components: Audit, Management, Development and Acquisition, and Support and Delivery. The ratings assigned to these individual components are used to quantify the overall effectiveness of the institution's IT risk management practices and conditions, and a familiar 1-5 rating scale similar to CAMELS is used. Examiners evaluate the functions identified within each component to assess the institution's ability to identify, measure, monitor, and control IT risks. A composite rating reflects the overall performance of IT within a financial institution.

Although the assessment of IT risk and your IT risk management program will be broken out on a separate report of examination page and in greater granularity, the expectations and standards of the Department have not changed in our IT examination reviews because of the URSIT implementation.

To provide you with additional clarity, we will host a web-based open forum industry discussion on November 20, 2025, that you are welcome to attend as we discuss the rollout and provide an overview of the URSIT rating system. A calendar invite will be forthcoming.

Feel free to reach out with any questions.

Sincerely,

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Cc: ASI
        NCUA
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Appendix A - URSIT Ratings

Composite Ratings Definitions

Composite - 1
Financial institutions and service providers rated composite 1 exhibit strong performance in every respect and generally have components rated 1 or 2. Weaknesses in IT are minor in nature and are easily corrected during the normal course of business. Risk management processes provide a comprehensive program to identify and monitor risk relative to the size, complexity, and risk profile of the entity. Strategic plans are well defined and fully integrated throughout the organization. This allows management to quickly adapt to changing market, business, and technology needs of the entity. Management identifies weaknesses promptly and takes appropriate corrective action to resolve audit and regulatory concerns. The financial condition of the service provider is strong and overall performance shows no cause for supervisory concern.

Composite - 2
Financial institutions and service providers rated composite 2 exhibit safe and sound performance but may demonstrate modest weaknesses in operating performance, monitoring, management processes, or system development. Generally, senior management corrects weaknesses in the normal course of business. Risk management processes adequately identify and monitor risk relative to the size, complexity, and risk profile of the entity. Strategic plans are defined but may require clarification, better coordination, or improved communication throughout the organization. As a result, management anticipates, but responds less quickly, to changes in market, business, and technological needs of the entity. Management normally identifies weaknesses and takes appropriate corrective action. However, greater reliance is placed on audit and regulatory intervention to identify and resolve concerns. The financial condition of the service provider is acceptable and while internal control weaknesses may exist, there are no significant supervisory concerns. As a result, supervisory action is informal and limited.

Composite - 3
Financial institutions and service providers rated composite 3 exhibits some degree of supervisory concern due to a combination of weaknesses that may range from moderate to severe. If weaknesses persist, further deterioration in the condition and performance of the institution or service provider is likely. Risk management processes may not effectively identify risks and may not be appropriate for the size, complexity, or risk profile of the entity. Strategic plans are vaguely defined and may not provide adequate direction for IT initiatives. As a result, management often has difficulty responding to changes in business, market, and technological needs of the entity. Self-assessment practices are weak and are generally reactive to audit and regulatory exceptions. Repeat concerns may exist indicating that management may lack the ability or willingness to resolve concerns. The financial condition of the service provider may be weak and/or negative trends may be evident. While financial or operational failure is unlikely, increased supervision is necessary. Formal or informal supervisory action may be necessary to secure corrective action.

Composite - 4
Financial institutions and service providers rated composite 4 operate in an unsafe and unsound environment that may impair the future viability of the entity. Operating weaknesses are indicative of serious managerial deficiencies. Risk management processes inadequately identify and monitor risk, and practices are not appropriate given the size, complexity, and risk profile of the entity. Strategic plans are poorly defined and not coordinated or communicated throughout the organization. As a result, management and the board are not committed to, or may be incapable of ensuring, that technological needs are met. Management does not perform self-assessments and demonstrates an inability or unwillingness to correct audit and regulatory concerns. The financial condition of the service provider is severely impaired or deteriorating. Failure of the financial institution or service provider may be likely unless IT problems are remedied. Close supervisory attention is necessary and, in most cases, formal enforcement action is warranted.

Composite - 5
Financial institutions and service providers rated composite 5 exhibit critically deficient operating performances and are in need of immediate remedial action. Operational problems and serious weaknesses may exist throughout the organization. Risk management processes are severely deficient and provide management little or no perception of risk relative to the size, complexity, and risk profile of the entity. Strategic plans do not exist or are ineffective, and management and the board provide little or no direction for IT initiatives. As a result, management is unaware of, or inattentive to, technological needs of the entity. Management is unwilling or incapable of correcting audit and regulatory concerns. The financial condition of the service provider is poor and failure is highly probable due to poor operating performance or financial instability. Ongoing supervisory attention is necessary.

Audit

Financial institutions and service providers are expected to provide independent assessments of their exposure to risks and the quality of internal controls associated with the acquisition, implementation, and use of information technology. Audit practices should address the IT risk exposures throughout the institution and its service provider(s) in the areas of user and data center operations, client/server architecture, local and wide-area networks, telecommunications, information security, electronic data interchange, systems development, and contingency planning. This rating should reflect the adequacy of the organization's overall IT audit program, including the internal and external audit's abilities to detect and report significant risks to management and the board of directors on a timely basis. It should also reflect the internal and external auditor's capability to promote a safe, sound and effective operation.

The performance of audit is rated based upon an assessment of factors, such as:

- The level of independence maintained by audit and the quality of the oversight and support provided by the board of directors and management;
- The adequacy of audit's risk analysis methodology used to prioritize the allocation of audit resources and to formulate the audit schedule;
- The scope, frequency, accuracy, and timeliness of internal and external audit reports;
- The extent of audit participation in application development, acquisition, and testing, to ensure the effectiveness of internal controls and audit trails;
- The adequacy of the overall audit plan in providing appropriate coverage of IT risks;
- The auditor's adherence to codes of ethics and professional audit standards;
- The qualifications of the auditor, staff succession, and continued development through training;

- The existence of timely and formal follow-up and reporting on management's resolution of identified problems or weaknesses; and
- The quality and effectiveness of internal and external audit activity as it relates to IT controls.

Ratings

- A rating of 1 indicates strong audit performance. Audit independently identifies and reports weaknesses and risks to the board of directors or its audit committee in a thorough and timely manner. Outstanding audit issues are monitored until resolved. Risk analysis ensures that audit plans address all significant IT operations, procurement, and development activities with appropriate scope and frequency. Audit work is performed in accordance with professional auditing standards and report content is timely, constructive, accurate, and complete. Because audit is strong, examiners may place substantial reliance on audit results.
- A rating of 2 indicates satisfactory audit performance. Audit independently identifies and reports weaknesses and risks to the board of directors or audit committee, but reports may be less timely. Significant outstanding audit issues are monitored until resolved. Risk analysis ensures that audit plans address all significant IT operations, procurement, and development activities; however, minor concerns may be noted with the scope or frequency. Audit work is performed in accordance with professional auditing standards; however, minor or infrequent problems may arise with the timeliness, completeness, and accuracy of reports. Because audit is satisfactory, examiners may rely on audit results but because minor concerns exist, examiners may need to expand verification procedures in certain situations.
- A rating of 3 indicates less than satisfactory audit performance. Audit identifies and reports weaknesses and risks; however, independence may be compromised and reports presented to the board or audit committee may be less than satisfactory in content and timeliness. Outstanding audit issues may not be adequately monitored. Risk analysis is less than satisfactory. As a result, the audit plan may not provide sufficient audit scope or frequency for IT operations, procurement, and development activities. Audit work is generally performed in accordance with professional auditing standards; however, occasional problems may be noted with the timeliness, completeness, or accuracy of reports. Because audit is less than satisfactory, examiners must use caution if they rely on the audit results.
- A rating of 4 indicates deficient audit performance. Audit may identify weaknesses and risks but it may not independently report to the board or audit committee and report content may be inadequate. Outstanding audit issues may not be adequately monitored and resolved. Risk analysis is deficient. As a result, the audit plan does not provide adequate audit scope or frequency for IT operations, procurement, and development activities. Audit work is often inconsistent with professional auditing standards and the timeliness, accuracy, and completeness of reports is unacceptable. Because audit is deficient, examiners cannot rely on audit results.
- A rating of 5 indicates critically deficient audit performance. If an audit function exists, it lacks sufficient independence and, as a result, does not identify and report weaknesses or risks to the board or audit committee. Outstanding audit issues are not tracked and no follow-up is performed to monitor their resolution. Risk analysis is critically deficient. As a result, the audit plan is ineffective and provides inappropriate audit scope and frequency for IT operations, procurement, and development activities. Audit work is not performed in accordance with professional auditing standards and major deficiencies are noted regarding the timeliness, accuracy, and completeness of audit reports. Because audit is critically deficient, examiners cannot rely on audit results.

Management

This rating reflects the abilities of the board and management as they apply to all aspects of IT acquisition, development, and operations. Management practices may need to address some or all of the following IT-related risks: strategic planning, quality assurance, project management, risk assessment, infrastructure and architecture, end-user computing, contract administration of third-party service providers, organization and human resources, and regulatory and legal compliance. Generally, directors need not be actively involved in day-to-day operations; however, they must provide clear guidance regarding acceptable risk exposure levels and ensure that appropriate policies, procedures, and practices have been established. Sound management practices are demonstrated through active oversight by the board of directors and management, competent personnel, sound IT plans, adequate policies and standards, an effective control environment, and risk monitoring. This rating should reflect the ability of the board and management as it applies to all aspects of IT operations. The performance of management and the quality of risk management are rated based upon an assessment of factors such as:

- The level and quality of oversight and support of the IT activities by the board of directors and management;
- The ability of management to plan for and initiate new activities or products in response to information needs and to address risks that may arise from changing business conditions;
- The ability of management to provide information reports necessary for informed planning and decision making in an effective and efficient manner;
- The adequacy of, and conformance with, internal policies and controls addressing the IT operations and risks of significant business activities;
- The effectiveness of risk monitoring systems;
- The timeliness of corrective action for reported and known problems;
- The level of awareness of and compliance with laws and regulations;
- The level of planning for management succession;
- The ability of management to monitor the services delivered and to measure the organization's progress toward identified goals in an effective and efficient manner;
- The adequacy of contracts and management's ability to monitor relationships with third-party servicers;
- The adequacy of strategic planning and risk management practices to identify, measure, monitor, and control risks, including management's ability to perform self-assessments; and
- The ability of management to identify, measure, monitor, and control risks and to address emerging information technology needs and solutions.
- In addition to the above, factors such as the following are included in the assessment of management at servicer providers:
- The financial condition and ongoing viability of the entity;
- The impact of external and internal trends and other factors on the ability of the entity to support continued servicing of client financial institutions; and
- The propriety of contractual terms and plans.

Ratings

- A rating of 1 indicates strong performance by management and the board. Effective risk management practices are in place to guide IT activities, and risks are consistently and effectively identified, measured, controlled, and monitored. Management immediately resolves audit and regulatory concerns to ensure sound operations. Written technology plans, policies and procedures, and standards are thorough and properly reflect the complexity of the IT environment. They have been formally adopted, communicated, and enforced throughout the organization. IT systems provide accurate, timely reports to management. These reports serve as the basis of major decisions and as an effective performance-

monitoring tool. Outsourcing arrangements are based on comprehensive planning; routine management supervision sustains an appropriate level of control over vendor contracts, performance, and services provided. Management and the board have demonstrated the ability to promptly and successfully address existing IT problems and potential risks.

- A rating of 2 indicates satisfactory performance by management and the board. Adequate risk management practices are in place and guide IT activities. Significant IT risks are identified, measured, monitored, and controlled; however, risk management processes may be less structured or inconsistently applied and modest weaknesses exist. Management routinely resolves audit and regulatory concerns to ensure effective and sound operations; however, corrective actions may not always be implemented in a timely manner. Technology plans, policies, procedures, and standards are adequate and are formally adopted. However, minor weaknesses may exist in management's ability to communicate and enforce them throughout the organization. IT systems provide quality reports to management that serve as a basis for major decisions and a tool for performance planning and monitoring. Isolated or temporary problems with timeliness, accuracy, or consistency of reports may exist. Outsourcing arrangements are adequately planned and controlled by management, and provide for a general understanding of vendor contracts, performance standards, and services provided. Management and the board have demonstrated the ability to address existing IT problems and risks successfully.

- A rating of 3 indicates less than satisfactory performance by management and the board. Risk management practices may be weak and offer limited guidance for IT activities. Most IT risks are generally identified; however, processes to measure and monitor risk may be flawed. As a result, management's ability to control risk is less than satisfactory. Regulatory and audit concerns may be addressed, but time frames are often excessive and the corrective action taken may be inappropriate. Management may be unwilling or incapable of addressing deficiencies. Technology plans, policies, procedures, and standards exist, but may be incomplete. They may not be formally adopted, effectively communicated, or enforced throughout the organization. IT systems provide requested reports to management, but periodic problems with accuracy, consistency, and timeliness lessen the reliability and usefulness of reports and may adversely affect decision making and performance monitoring. Outsourcing arrangements may be entered into without thorough planning. Management may provide only cursory supervision that limits its understanding of vendor contracts, performance standards, and services provided. Management and the board may not be capable of addressing existing IT problems and risks, as evidenced by untimely corrective actions for outstanding IT problems.

- A rating of 4 indicates deficient performance by management and the board. Risk management practices are inadequate and do not provide sufficient guidance for IT activities. Critical IT risks are not properly identified, and processes to measure and monitor risks are not properly identified, and processes to measure and monitor risks are deficient. As a result, management may not be aware of and is unable to control risks. Management may be unwilling or incapable of addressing audit and regulatory deficiencies in an effective and timely manner. Technology plans, policies and procedures, and standards are inadequate, have not been formally adopted or effectively communicated throughout the organization, and management does not effectively enforce them. IT systems do not routinely provide management with accurate, consistent, and reliable reports, thus contributing to ineffective performance monitoring or flawed decision-making. Outstanding arrangements may be entered into without planning or analysis, and management may provide little or no supervision of vendor contracts, performance standards, or services provided. Management and the board are unable to address existing IT problems and risks, as evidenced by ineffective actions and longstanding IT weaknesses. Strengthening of management and its processes is necessary. The financial condition of the service provider may threaten its viability.

- A rating of 5 indicates critically deficient performance by management and the board. Risk management practices are severely flawed and provide inadequate guidance for IT activities. Critical IT risks are not identified, and processes to measure and monitor risks do not exist, or are not effective.

Management's inability to control risk may threaten the continued viability of the institution or service provider. Management is unable or unwilling to correct audit and regulatory identified deficiencies and immediate action by the board is required to preserve the viability of the institution or service provider. If they exist, technology plans, policies, procedures, and standards are critically deficient. Because of systemic problems, IT systems do not produce management reports that are accurate, timely, or relevant. Outsourcing arrangements may have been entered into without management planning or analysis, resulting in significant losses to the financial institution or ineffective vendor services. The financial condition of the service provider presents an imminent threat to its viability.

Development and Acquisition

This rating reflects an organization's ability to identify, acquire, install, and maintain appropriate information technology solutions. Management practices may need to address all or parts of the business process for implementing any kind of change to the hardware or software used. These business processes include an institution's or service provider's purchase of hardware or software, development and programming performed by the institution or service provider, purchase of services from independent vendors or affiliated data centers, or a combination of these activities. The business process is defined as all phases taken to implement a change including researching alternatives available, choosing an appropriate option for the organization as a whole, converting to the new system, or integrating the new system with existing systems. This rating reflects the adequacy of the institution's systems development methodology and related risk technology. This rating also reflects the board's and management's ability to enhance and replace information technology prudently in a controlled environment. The performance of systems development and acquisition and related risk management practice is rated based upon an assessment of factors such as:

- The level and quality of oversight and support of systems development and acquisition activities by senior management and the board of directors;
- The adequacy of the organizational and management structures to establish accountability and responsibility for IT systems and technology initiatives;
- The volume, nature, and extent of risk exposure to the financial institution in the area of systems development and acquisition;
- The adequacy of the institution's system development life cycle (SDLC) and programming standards;
- The quality of project management programs and practices which are followed by developers, operators, executive management/owners, independent vendors or affiliated servicers, and end users;
- The independence of the quality assurance function and the adequacy of controls over program changes;
- The quality and thoroughness of system documentation;
- The integrity and security of the network, system, and application software;
- The development of information technology solutions that meet the needs of end users; and
- The extent of end user involvement in the system development process.
- In addition to the above, factors such as the following are included in the assessment of development and acquisition at service providers:
    - o The quality of software releases and documentation; and
    - o The adequacy of training provided to clients.

Ratings

- A rating of 1 indicates strong systems development, acquisition, implementation, and change management performance. Management and the board routinely demonstrate successfully the ability to identify and implement appropriate IT solutions while effectively managing risk. Project management techniques and the SDLC are fully effective and supported by written policies, procedures, and project controls that consistently result in timely and efficient project completion. An independent quality assurance function provides strong controls over testing and program change management. Technology solutions consistently meet end-user needs. No significant weaknesses or problems exist.

- A rating of 2 indicates satisfactory systems development, acquisition, implementation, and change management performance. Management and the board frequently demonstrate the ability to identify and implement appropriate IT solutions while managing risk. Project management and the SDLC are generally effective; however, weaknesses may exist that result in minor project delays or cost overruns. An independent quality assurance function provides adequate supervision of testing and program change management, but minor weaknesses may exist. Technology solutions meet end-user needs. However, minor enhancements may be necessary to meet original user expectations. Weaknesses may exist; however, they are not significant and they are easily corrected in the normal course of business.

- A rating of 3 indicates less than satisfactory systems development, acquisition, implementation, and change management performance. Management and the board may often be unsuccessful in identifying and implementing appropriate IT solutions; therefore, unwarranted risk exposure may exist. Project management techniques and the SDLC are weak and may result in frequent project delays, backlogs or significant cost overruns. The quality assurance function may not be independent of the programming function, which may adversely impact the integrity of testing, and program change management. Technology solutions generally meet end-user needs, but often require an inordinate level of change after implementation. Because of weaknesses, significant problems may arise that could result in disruption to operations or significant losses.

- A rating of 4 indicates deficient systems development, acquisition, implementation, and change management performance. Management and the board may be unable to identify and implement appropriate IT solutions and do not effectively manage risk. Project management techniques and the SDLC are ineffective and may result in severe project delays and cost overruns. The quality assurance function is not fully effective and may not provide independent or comprehensive review of testing controls or program change management. Technology solutions may not meet the critical needs of the organization. Problems and significant risks exist that require immediate action by the board and management to preserve the soundness of the institution.

- A rating of 5 indicates critically deficient systems development, acquisition, implementation, and change-management performance. Management and the board appear to be incapable of identifying and implementing appropriate information technology solutions. If they exist, project management techniques and the SDLC are critically deficient and provide little or no direction for development of systems or technology projects. The quality assurance function is severely deficient or not present and unidentified problems in testing and program change management have caused significant IT risks. Technology solutions do not meet the needs of the organization. Serious problems and significant risks exist that raise concern for the financial institution or service provider's ongoing viability.

Support and Delivery

This rating reflects an organization's ability to provide technology services in a secure environment. It reflects not only the condition of IT operations but also factors such as reliability, security, and integrity, which may affect the quality of the information delivery system. The factors include customer support and training, and the ability to manage problems and incidents, operations, system performance, capacity planning, and facility and data management. Risk management practices should promote effective, safe, and sound IT operations that ensure the

continuity of operations and the reliability and availability of data. The scope of this component rating includes operational risks throughout the organization and service providers.

The rating of IT support and delivery is based on a review and assessment of requirements such as:

- The ability to provide a level of service that meets the requirements of the business;
- The adequacy of security policies, procedures, and practices in all units and at all levels of the financial institution and service providers;
- The adequacy of data controls over preparation, input, processing, and output;
- The adequacy of corporate contingency planning and business resumption for data centers, networks, service providers and business units;
- The quality of processes or programs that monitor capacity and performance;
- The adequacy of controls and the ability to monitor controls at service providers;
- The quality of assistance provided to users, including the ability to handle problems;
- The adequacy of operating policies, procedures, and manuals;
- The quality of physical and logical security, including the privacy of data;
- The adequacy of firewall architectures and the security of connections with public networks.
- In addition to the above, factors such as the following are included in the assessment of support and delivery at service providers:
  - The adequacy of customer service provided to clients; and
  - The ability of the entity to provide and maintain service level performance that meets the requirements of the client.

Ratings

- A rating of 1 indicates strong IT support and delivery performance. The organization provides technology services that are reliable and consistent. Service levels adhere to well-defined service-level agreements and routinely meet or exceed business requirements. A comprehensive corporate contingency and business resumption plan is in place. Annual contingency plan testing and updating is performed; and, critical systems and applications are recovered within acceptable time frames. A formal written data security policy and awareness program is communicated and enforced throughout the organization. The logical and physical security for all IT platforms is closely monitored, and security incidents and weaknesses are identified and quickly corrected. Relationships with third-party service providers are closely monitored. IT operations are highly reliable, and risk exposure is successfully identified and controlled.
- A rating of 2 indicates satisfactory IT support and delivery performance. The organization provides technology services that are generally reliable and consistent; however, minor discrepancies in service levels may occur. Service performance adheres to service agreements and meets business requirements. A corporate contingency and business resumption plan is in place, but minor enhancements may be necessary. Annual plan testing and updating is performed and minor problems may occur when recovering systems or applications. A written data security policy is in place but may require improvement to ensure its adequacy. The policy is generally enforced and communicated throughout the organization, e.g., through a security awareness program. The logical and physical security for critical IT platforms is satisfactory. Systems are monitored, and security incidents and weaknesses are identified and resolved within reasonable time frames. Relationships with third-party service providers are monitored. Critical IT operations are reliable and risk exposure is reasonably identified and controlled.
- A rating of 3 indicates that the performance of IT support and delivery is less than satisfactory and needs improvement. The organization provides technology services that may not be reliable or

consistent. As a result, service levels periodically do not adhere to service-level agreements or meet business requirements. A corporate contingency and business resumption plan is in place but may not be considered comprehensive. The plan is periodically tested; however, the recovery of critical systems and applications is frequently unsuccessful. A data security policy exists; however, it may not be strictly enforced or communicated throughout the organization. The logical and physical security for critical IT platforms is less that satisfactory. Systems are monitored; however, security incidents and weaknesses may not be resolved in a timely manner. Relationships with third-party service providers may not be adequately monitored. IT operations are not acceptable and unwarranted risk exposures exist. If not corrected, weaknesses could cause performance degradation or disruption to operations.

- A rating of 4 indicates deficient IT support and delivery performance. The organization provides technology services that are unreliable and inconsistent. Service-level agreements are poorly defined and service performance usually fails to meet business requirements. A corporate contingency and business resumption plan may exist, but its content is critically deficient. If contingency testing is performed, management is typically unable to recover critical systems and applications. A data security policy may not exist. As a result, serious supervisory concerns over security and the integrity of data exist. The logical and physical security for critical IT platforms is deficient. Systems may be monitored, but security incidents and weaknesses are not successfully identified or resolved. Relationships with third-party service providers are not monitored. IT operations are not reliable and significant risk exposure exists. Degradation in performance is evident and frequent disruption in operations has occurred.

- A rating of 5 indicates critically deficient IT support and delivery performance. The organization provides technology services that are not reliable or consistent. Service-level agreements do not exist and service performance does not meet business requirements. A corporate contingency and business resumption plan does not exist. Contingency testing is not performed and management has not demonstrated the ability to recover critical systems and applications. A data security policy does not exist, and a serious threat to the organization's security and data integrity exists. The logical and physical security for critical IT platforms is inadequate, and management does not monitor systems for security incidents and weaknesses. Relationships with third-party service providers are not monitored, and the viability of a service provider may be in jeopardy. IT operations are severely deficient, and the seriousness of weaknesses could cause failure of the financial institution or service provider if not addressed.