TO: Cybersecurity (H) Working Group Members, Interested Regulators, and Interested Parties

REQUEST FOR INPUT

During the Cybersecurity Working Group's call on March 7, the Working Group covered several projects and is asking for input as the work moves forward. Additionally, one further item was discussed, which we are restating to enable a proper introduction.

1. The Working Group will be working on a response plan to aid states in responding to cybersecurity events. The outline of that proposed document is included in the materials posted here. As part of the document, the regulators will be considering an information gathering template to aid states and facilitate the collection of information. An effective guide may support lead states taking a leadership role in corresponding with companies. Requested input includes:
   a. Whether industry is aware of templates already in use that are effective in facilitating the transmission of information.
   b. Whether industry is supportive of an optional information gathering template if appropriate guidance is included, which could include:
      i. Text indicating the template is optional.
      ii. Guidance indicating the need for flexibility in the process of gathering information recognizing that facts and circumstances in the wake of a cyber event are often fluid and uncertain.
   c. States are also encouraged to share their existing templates if they have not already been shared with NAIC staff.
   d. Note for all interested stakeholders – a draft template will eventually be subject to public comment allowing for input to ensure the tool is responsive to all stakeholder considerations.

2. The Working Group also initiated a discussion in response to the Treasury's report included here. Treasury's report notes, "Data limitations prevent Treasury and the FBIIC from fully assessing the significance of the concentration in cloud services across the sector." As part of our charge to monitor cybersecurity trends and federal work on the topic, we discussed whether to require insurers to submit their System Summary Grids annually, instead of only during domestic examinations. Requested input includes:
   a. Do regulators have an appetite for pursuing a rapid approach, by adopting an old document to a new purpose instead of building one from scratch?
   b. Do insurance regulators have concerns about getting ahead of other financial services regulators in pursuing macro-level solutions?
   c. Do the limitations that exist for System Summary Grids, which contain data on financially significant systems only and would not provide a complete view of a company's IT environment, cause regulators concern, and if so, what would be a suitable alternative?
   d. Does industry have any other concerns about making the reporting requirement for System Summary Grids be annually and more frequent than "during exams"?
   e. What are industry's concerns with repurposing an old examination document into an annual reporting requirement?

3. By way of introduction, or reintroduction, Sara Robben will be working with myself to support the Working Group this year. She supported the previous iteration of this Working Group and will bring great technical expertise.

   Input will be accepted through **May 1**, and should be submitted to Miguel Romero (maromero@naic.org) and Sara Robben (srobben@naic.org).