

Date: 05/15/25

This checklist is designed to help financial institutions - particularly community banks - implement and verify strong ATM security controls.

1. Physical Security

- Install ATMs in well-lit, secure locations with surveillance coverage (CCTV).
- Video surveillance footage is retained per policy (typically 90+ days).
- Use anti-skimming devices on all card readers.
- Inspect ATMs regularly for signs of tampering (false fronts, overlays).
- Anchor ATMs securely to prevent theft.
- Use high-security locks and limit physical access to technicians.
- Maintain an audit log for maintenance and service visits.
- Install vibration/shock sensors to detect drilling or cutting attempts.
- Use ink dye packs or currency-neutralization systems in case of forced access.
- Regularly test physical alarm systems connected to ATMs.

2. Network Security

- Use VPNs or private circuits (MPLS, etc.) for ATM-to-host communication—never public internet.
- ATM communications are encrypted (e.g., TLS or VPN for IP-based ATMs).
- Segment ATM networks from other internal networks (use VLANs or dedicated firewalls).
- Enforce IP whitelisting and restrict allowed ports/protocols (e.g., block all except required ports).
- Regularly monitor network traffic for anomalies or unauthorized connections.
- Ensure remote access (if used) is tightly controlled with MFA and logging.
- Use MAC address filtering to restrict which devices can connect to the ATM network.
- Perform routine vulnerability scans and penetration tests of ATM network infrastructure.

3. Logical/Software Security

- Harden the operating system (disable unused services, remove bloatware).
- Apply all relevant OS and application security patches promptly.
- Use whitelisting for executable applications (e.g., AppLocker or third-party tools).
- Disable all unused USB and serial ports in BIOS and OS.
- Enforce strong authentication for administrative access (e.g., smart cards, MFA).
- Run antivirus/anti-malware solutions with regular signature updates.
- Enable full disk encryption to protect ATM data at rest from theft or unauthorized access.
- Use secure boot configurations to prevent bootkits or unauthorized OS loading.
- Disable auto-run and script execution to mitigate USB-based attacks.
- Remote key loading is encrypted and authenticated.

4. ATM Application Configuration

- Ensure the ATM application is locked down and can't be exited to access the OS.
- Enable journaling and transaction logging.
- Configure alerts for suspicious activity (e.g., repeated failed PINs, physical intrusion alerts).
- Remove or disable default passwords and accounts from ATM software.
- Use encrypted PIN pad (EPP) and enforce full encryption of cardholder data (PCI DSS compliant).
- Ensure ATM software logs are securely stored and transmitted (preferably encrypted).
- Implement application-layer integrity monitoring (to detect unauthorized software changes).

5. Access Control & Monitoring

- Enforce the principle of least privilege for all ATM service accounts.
- Implement role-based access controls and dual control for sensitive operations.
- Enable real-time alerting for intrusion, unauthorized access, or tampering.
- Maintain comprehensive access and audit logs and review them regularly.
- Use centralized SIEM logging for all ATM-related logs and events.
- Rotate service credentials regularly and audit service account usage.

6. Vendor & Patch Management

- Establish a formal patching process with your ATM vendor for OS and app updates.
- Validate updates in a test environment before applying to production.
- Ensure third-party vendors follow your institution's access and security policies.
- Require third-party service providers to sign security and confidentiality agreements.
- Require vendors to use secure, logged service channels (e.g., jump servers with session recording).
- Vendor access to ATMs (remote or onsite) is logged and reviewed.
- Establish a review cycle for third-party risk assessments tied to ATM services.

7. Compliance & Risk Management

- Conduct regular ATM risk assessments (physical, logical, and operational).
- Align ATM security practices with GLBA, FFIEC, PCI DSS, and other applicable frameworks.
- Document policies and procedures for ATM maintenance, upgrades, and incident response.
- Include ATMs in business continuity and incident response plans.
- Include ATM scenarios in tabletop incident response drills.
- Perform periodic assessments against PCI PIN Security Requirements and PCI DSS, even if not strictly required.
- Maintain documentation of encryption key management procedures.

8. User Education & Awareness

- Train frontline staff to recognize and respond to signs of ATM tampering and compromise.
- Provide customer education on skimming, shoulder surfing, and suspicious behavior.
- Post emergency contact information near ATMs for suspicious activity reporting.
- Periodically assess ATM placement and surrounding areas for customer safety risks.
- Use screen overlays to warn users about card skimming or suspicious individuals.