MITRATECH | Continuity

**Opening Remarks & Introductions**

# Agenda

| | |
|---|---|
| **9:00 AM** | • Opening Remarks & Introductions |
| **9:10 AM** | • Recent Enhancements & Roadmap |
| **9:35 AM** | • A Regulatory Discussion |
| **10:05 AM** | • BREAK |
| **10:15 AM** | • Optimizing your Investment |
| **10:55 AM** | • Live Q&A |
| **11:30 AM** | • A Live GRC Technology Walkthrough |
| **12:00 PM** | • Enjoy the rest of your day! |

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## Meet the Team

**Donna Cameron**
**CRCM, CCBCO**
Senior Regulatory
Compliance Expert

**Lori Peterson CRCM**
Senior Regulatory
Compliance Expert

**Stephanie Fox**
**CCBCO, CCBRS**
Manager, GRC Client Success

**Cherilyn Genovese**
**CAMS, CCBRS**
Account Manager

**Justin Cole**
**CRCM, CAMS**
Senior Regulatory
Compliance Advisor

**Sarah Boisvert**
Senior Product Owner

**Kimberly Snodgrass,**
**DBA**
Account Manager

**Cat Wenham**
Account Manager

# Continuity

- ○ Product cycle

- ○ Continuity's direction for 2023 and beyond

- ○ Product Roadmap Snapshot

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# Product Roadmap Snapshot

## Out Now

- **Ad and Disclosure Reviews**

- **Compliance & Risk Newsletter**

  - Board ready material (one stop shop)

- **Expanded changelogs**

  - Including File settings, ToDo Assignee/Schedule changes, Custom ToDo form fields changes

- **Enhanced deletion confirmations**

  - Consistency platform-wide
  - Avoid costly errors

## Coming Next

- **Ad Review Project**

  - Same great ToDo content, new expanded functionality

- **View-only access**

  - Give your auditor or examiner the ability to gather evidence on the platform.

- **Report Builder enhancements**

  - Do more in Report builder

## Future Plans

- **Reporting overhaul**

  - Driven by client needs

- **Dashboard redesign**

  - Find important ToDos more quickly

- **Back end upgrades for content management and platform performance**

# Advertising and Disclosure Reviews

**Advertising and Disclosure Reviews can be performed by the ROC team resulting in:**

➤ Time savings - eliminating strain on your internal resource

➤ The ability to run expert level advertising and disclosure reviews

➤ Minimized regulatory risk & reputational damage

➤ Additional support for under resourced teams

## Client Testimonial

*"Thankful to have a built in support system with Continuity's advertisement review feature!"*

*"Our Mortgage Compliance Officer was out on leave and I offered to handle the mortgage marketing approvals in their absence. Although I have an idea of the basics, I was really seeking a second opinion for the more complex features of the ad piece to make sure I wasn't missing or overlooking anything. I submitted a few advertisements to Continuity and Justin provided great feedback.*

*The turnaround time for a response was less than 24 hours!* *When you are struggling to know if something could be interpreted as a triggering term, it's so helpful having a resource to utilize to confirm or deny your thoughts and provide regulation references. Thankful to have a built in support system with Continuity's advertisement review feature!"*

**Brittany Fischer, AVP/Bank Compliance Officer - Meridian Bank**
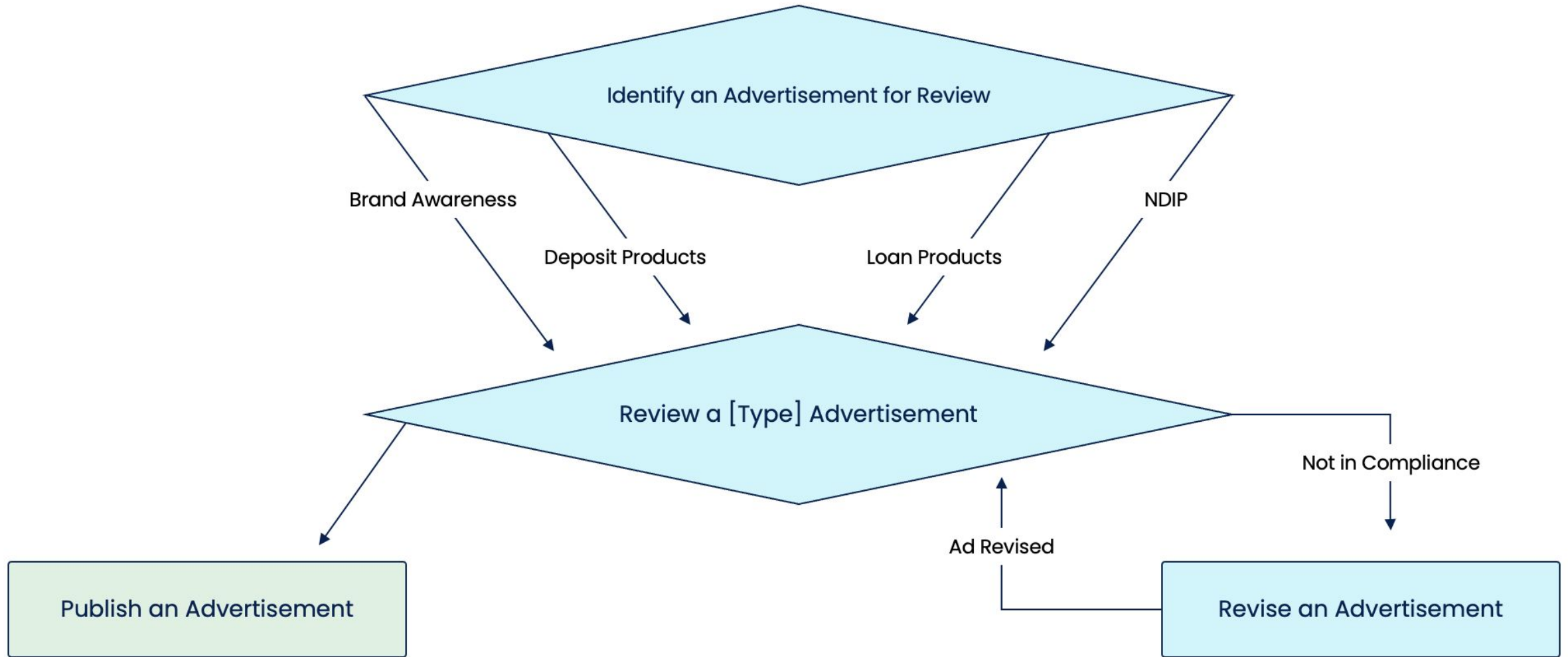
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# MitraTech Touches

March 23  |  Compliance & Risk Monthly Newsletter

**Support Center link –
Compliance & Risk Monthly Newsletter**

# Review an Advertisement Project

# Hot Topics

1. 1071
2. CRA
3. FDIC Signage
4. Beneficial Ownership
5. Overdraft fees
6. CFPB focus

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INTERACT × MITRATECH

WE'RE LETTING THE GOOD TIMES ROLL... ALL THE WAY TO NOLA!

# Interact 2023
## New Orleans

MITRATECH | THE ROOSEVELT, NEW ORLEANS | OCT. 2-5, 2023

GET 2.5 DAYS OF EXCLUSIVE INSIGHTS, ONGOING TECH EXPO ACCESS, AND IMMERSIVE TRAINING

REGISTER TODAY WITH PROMO CODE "ContinuityUG25" ⊙

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# Risk and Compliance Conference

June 13-16, 2023  •  Henry B. González Convention Center  •  San Antonio, TX

# Visit us at booth #533

# RegControls & Supporting Materials

- 1071

- CRA

- FDIC Signage

- Overdraft protection

# Client Testimonials
## (Federal Compliance Chat and Ticket Feature)

**TRID (2nd Lien, Contact Info); Reg. E (P2P and Error Resolution);
FDIC & NSF Re-presentment, and HMDA (LAR Omissions)**

*"As a former Assurance Manager of Internal/External Bank Audits, I am well versed with the immense challenge it is staying current on and interpreting regulatory compliance . Continuity's Regulatory Compliance Team and RegAdvisor is a great resource for banks of all sizes and I would recommend it to all of my former clients. In my current role I frequently utilize their Chat feature to obtain a critical second opinion.  I appreciate their quick responses and their expertise that enables me to make confident decisions for all banking units."  Elena Borjas, CPA, SVP/Senior Compliance Administrator - Fidelity Bank, N.A.*

*"Continuity has a wide variety of tools available to aid banks in their Compliance needs. I find the chat feature to be one of the best and most used options for myself. As a Compliance Officer for a Community Bank, I must wear multiple hats and many times when I need a second opinion or advice on a Compliance issue, time is a factor. The chat feature is quick and the team at Continuity have a great knowledge base to pull from. I appreciate the fact that they also provide a follow up email including the chat verbiage, this helps when I am writing an opinion for my staff."  Dan Ware, AVP & Compliance/BSA Officer - Citizens Bank of West Virginia*

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**Break**

Best practice tips and tricks helping you to get maximum value from your investment

- RegAdvisorPro Solution

- RegControls & ControlsBuilder

- VendorComply

- RegAdvisorPro

- RegAdvisor State

- RegAdvisorEA

# RegAdvisorPro

RegAdvisor®Pro is a regulatory change management system designed to assist financial institutions in identifying, understanding, and implementing regulatory changes issued by federal regulators, including the CFPB, FCA, FDIC, Federal Reserve, OCC, and NCUA, as well as FinCEN, the FFIEC, NACHA, and others as appropriate.

★ Alert Types

★ Coverage

★ Share & Subscriber

★ Assigning additional RegAdvisor actions

# RegAdvisor State

RegAdvisor State is an add-on module for RegAdvisor Pro clients that provides summaries of changes in state regulatory requirements affecting banks, credit unions, mortgage lenders and other financial service providers. Clients can receive state regulatory content by subscribing to one, multiple or all fifty states, Washington, D.C., Guam or Puerto Rico. Users manage state regulatory changes within the RegAdvisor Console, using the same tools used for managing federal regulatory changes.

★ [Coverage](#)

# RegAdvisorEA

RegAdvisorEA is an add-on module for RegAdvisor Pro that notifies clients of enforcement actions issued by covered Federal agencies.

★ [Coverage](#)

# Tips & Tricks

- ★ Dashboard

- ★ Settings

- ★ Console

- ★ Available Controls

- ★ P&P Library

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# Dashboard

# RegAdvisor Settings

# Console

## Dashboard / Solutions ∨ / Oversight ∨ / Settings ∨

- Policy & Procedure Library
- RegAdvisor
- RegControls
- Vendor Management

notifications for ... on alerts by ... ion are alway enabled. Learn more in the Support Center Article.

## RegAdvisor

🏛 Manage RegAdvisor Settings

**Export All Alerts**

### Active Alerts

| Processing | Review / Assign | Implement |
|---|---|---|
| 0 | 1 | 1 |
| 0 Late | 1 Late | 1 Late |
| 0 On Time | 0 On Time | 0 On Time |

### Productivity (Past 90 days)

| Not Applicable | Total Received | Completed |
|---|---|---|
| 1 | 89 | 227 |

✕ Clear All

Filter by Name 🔍  ▽▾  ▽▾  ▽▾ ³  📅  📅  📅  📅

| Name | Source | Type | Stage | Issued ↑= | Effective | Next Due | Done |
|---|---|---|---|---|---|---|---|
| 2023 HMDA Asset-Size Exemption Threshold | Federal | Final Rule | Review / Assign | 12/30/22 | 01/01/23 | 01/27/23 | - |
| Libyan Sanctions Regulations | Federal | Final Rule | Implement | 10/03/22 | 10/03/22 | 02/23/23 | - |

---

RegAdvisor / 2023 HMDA Asset-Size Exemption Threshold

## 2023 HMDA Asset-Size Exemption Threshold

PDF View | Share

■ ▢ ▢ ▢
easy          hard

The asset size threshold for exemption from HMDA data collection requirements **will increase from $50 million to $54 million for 2023**. Institutions with assets of $54 million or less as of 12/31/2022 are exempt from collecting and reporting HMDA data in 2023.

| | |
|---|---|
| 🏛 Issued | ● Dec 30, 2022 |
| Dec 30, 2022 | ● Processed |
| 🏛 Effective | ● Jan 01, 2023 |
| Apr 20, 2023 | Review / Assign (In Progress) |

### References

| Issuing Agencies | Consumer Financial Protection Bureau |
|---|---|
| Reference URL | https://www.federalregister.gov/documents/2022/12/30/2022-28441/home-mortgage-disclosure-regulation-c-adjustment-to-asset-size-exemption-threshold |

### Applicability

| Regulators: | Comptroller of the Currency<br>Consumer Financial Protection Bureau<br>Farm Credit Administration<br>Federal Deposit Insurance Corporation<br>Federal Reserve Board<br>National Credit Union Administration |
|---|---|
| Product Categories for Federal Alerts: | Commercial Mortgage<br>Consumer Mortgage |
| Compliance Categories: | Governance |

### Available RegControls™

| On/Off | Name | Assignees | SmartFolder | Frequency |
|---|---|---|---|---|
| Off | Determine HMDA Reporting & Partial Exemption Status (Effective 1/1/2022 and after) | Compliance Officer (unassigned), Senior Strategist (Strategist, Senior) | Lending Program | Every Year |

| Analysis | Implementation |
|---|---|

This update is a statutory annual adjustment based on the percentage change to the Consumer Price Index for Urban Wage Earners and Clerical Workers for the twelve-month period ending in November 2022.
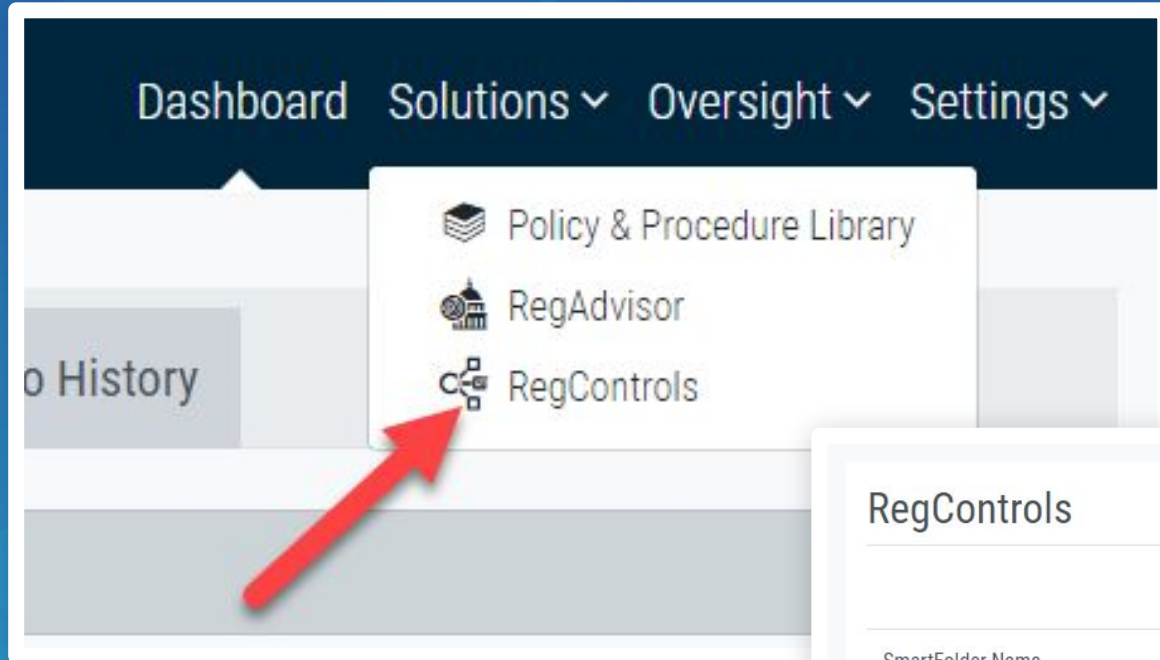
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# Available RegControls with RegAdvisor



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# Available RegControls with RegAdvisor

## Monitor Agency Issuances
Copy Control | Add ToDo

This Control allows the financial institution to document and review other federal or state agency sources (aside from RegAdvisor Alerts) and determine if action is needed.

OFF **Review Federal or State Agency Issuances**

📅 OnDemand

👥 Compliance Officer (unassigned)

### Implement Recommended Action for [Agency] Issuance

📅 Linked via ToDoScript

👥 (no assignees)

## Review an Enforcement Action
Copy Control | Add ToDo

This Control documents the institution's review and analysis of an enforcement action involving a third party. If provisions are applicable to the institution's operations, a response and further review are also documented.

ON **Review an Enforcement Action**

📅 OnDemand

👥 Senior Strategist (Strategist, Senior)

### Analyze an Enforcement Action - [Issuing Agency] vs. [Defendant]

📅 Linked via ToDoScript

👥 (no assignees)

### Review Response to an Enforcement Action Analysis - [Issuing Agency] vs. [Defendant]

📅 Linked via ToDoScript

👥 (no assignees)

# Policy and Procedures

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- **RegControls**

- **ControlsBuilder**

# RegControls

Continuity's RegControls™ solution houses hundreds of pre-built compliance procedures that enable clients to migrate manual Compliance Management System (CMS) processes onto an automated technology platform. RegControls are based on Federal laws, Federal regulations, regulatory guidance and examination manuals and are updated to reflect new and revised requirements before the compliance effective date.

★ [Overview](#)

★ [Development process](#)

★ [Revision process](#)

★ [Control types](#)

# RegControl Types



**- Preview -** Determine HMDA Reporting & Partial Exemption Status (Effective 1/1/2022 and after)

×

| Instructions | Determine | Developer |
|---|---|---|

## Determine HMDA reporting and partial exemption status.

Use this ToDo to determine whether the institution is a closed-end and/or open-end HMDA reporter and whether the institution qualifies for a partial exemption from reporting certain fields.

Let's begin.

ⓘ This is a ToDo preview for testing and previewing purposes only. Data entered in a preview cannot be saved. "Next Step", "Save for Later" and "Done" buttons are disabled. Please use tabs for navigation.

Next Step >

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# RegControl Types

- **Preview** - Review a HMDA-Reportable Application (Effective 5/24/2018)    ✕

| Instructions | Review | Developer |

## Ensure accurate HMDA loan application reporting.

In this ToDo you will review a loan application and document whether it is being accurately reported according to the Home Mortgage Disclosure Act (HMDA or Regulation C).

If corrections are needed, you will have the option to forward this information to the person responsible for making those edits.

Let's begin.

ⓘ This is a ToDo preview for testing and previewing purposes only. Data entered in a preview cannot be saved. "Next Step", "Save for Later" and "Done" buttons are disabled. Please use tabs for navigation.

Next Step >

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# RegControl Types



**- Preview -** Monitor Overdraft Protection Program - Credit Union

×

| Instructions | Monitor | Developer |

## Monitor overdraft protection program.

Use this ToDo to determine and document whether your institution's overdraft protection program complies with regulatory requirements and guidance.

To assist you in completing this ToDo, you may wish to gather the following information:

- Overdraft protection line of credit Regulation Z disclosure;
- Opt in notice and consent testing results;
- Suspensions of overdraft privilege; and
- Accounts that exceeded limits and accompanying authorizations.

Let's begin.

ℹ This is a ToDo preview for testing and previewing purposes only. Data entered in a preview cannot be saved. "Next Step", "Save for Later" and "Done" buttons are disabled. Please use tabs for navigation.

Next Step >

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# RegControl Types



- **Preview** - Record CRA Public File Update - Main Office

×

| Instructions | Update | Developer |

## Update the CRA public file.

You are being asked to update the bank's main office CRA public file to ensure that the file meets regulatory timeframe and content requirements. The CRA regulation requires that the bank update its CRA public file annually by 4/1.

Let's begin.

ⓘ This is a ToDo preview for testing and previewing purposes only. Data entered in a preview cannot be saved. "Next Step", "Save for Later" and "Done" buttons are disabled. Please use tabs for navigation.

Next Step >

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# RegControl Tips & Tricks

Discovery

Control types

Available RegControls

- Do we have a planned and documented Monitoring Program? If no, should we develop one?

- How do we determine which Controls we will use?

- Which controls do we use first?

- Do we perform Monitoring in other places?

- Does testing occur in my 1st Line of Defence?

- Are quality control reviews in place?

- What's the scope of our Monitoring?

- Where is it documented?

- Are there other software tools that are used in Compliance Monitoring? (i.e. BSA, employee training)

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| | Do we Monitor? | Where? | Who? | How Often? | Smart Folder Name | Control Name | Control Objective | Schedule | Assignee(s) |
|---|---|---|---|---|---|---|---|---|---|
| 16 | | | | | Appraisal and Evaluations Program | Monitor Compliance with Appraisal and Evaluation Requirements | This Control determines and documents whether the institution's program is in compliance with regulatory requirements and the Interagency Appraisal and Evaluation Guidelines. | Every Year | Compliance Officer, Operations Manager |
| 17 | | | | | Appraisal and Evaluations Program | Record Appraisal or Evaluation Deferral | This Control records deferral and subsequent receipt of an appraisal or evaluation. | OnDemand | Loan Administrator, Operations Manager |
| 18 | | | | | Appraisal and Evaluations Program | Record Temporary Appraiser Waiver Application | This Control allows the financial institution to record the temporary appraiser waiver application submitted to the Appraisal Subcommittee (ASC) of the FFIEC. | OnDemand | CEO |
| 19 | | | | | Appraisal and Evaluations Program | Record Temporary Appraiser Waiver Application - FFIEC Decision | This Control allows the financial institution to record the Federal Financial Institutions Examination Council's decision concerning the institution's temporary appraiser waiver application. | OnDemand | CEO |
| 20 | | | | | Appraisal and Evaluations Program | Review a Real Estate Appraisal (Effective 1/1/2020) | This Control documents and determines whether an appraisal complies with USPAP requirements and the Interagency Appraisal and Evaluation Guidelines. | OnDemand | Compliance Officer, Loan Administrator |
| 21 | | | | | Appraisal and Evaluations Program | Review a Real Estate Evaluation | This Control allows the institution to determine and document whether a real estate evaluation complies with regulatory requirements and the Interagency Appraisal and Evaluation Guidelines. | OnDemand | Compliance Officer |
| 22 | | | | | Audit Program | Monitor Branch Signage Compliance (Branch Visits) | This Control allows the institution to verify that all branch notices are in compliance with regulations and are posted as required. | Every Year | Compliance Officer |
| 23 | | | | | Audit Program | Monitor Report of Branch Notice Compliance | This Control (used in conjunction with "Distribute Branch Notices") ensures that the branch managers' review process is accurate and complete. | Every Year | Compliance Officer |
| 24 | | | | | Audit Program | Record Distribution of Branch Notices | This Control allows the institution to upload notices that are required to be posted in branches, and have each branch manager complete a compliance review of branch signage. | Every Year | Compliance Officer |
| 25 | | | | | Audit Program | Review Branch Signage Compliance (Branch Visits) | This Control allows the institution to document branch visit reviews of branch signage compliance and should be used in conjunction with "Monitor Branch Signage Compliance (Branch Visits)". | OnDemand | Branch Managers |
| 26 | | | | | Automated Clearing House (ACH) Program | Monitor ACH Underwriting Standards | This Control allows the financial institution to monitor Automated Clearinghouse (ACH) underwriting standards to determine if they are sufficient or need improvement. | OnDemand | Operations Manager |
| 27 | | | | | Automated Clearing House (ACH) Program | Monitor Nacha Contact Registry Compliance | This Control monitors the institution's compliance with Nacha contact registry requirements. | Every Year | Compliance Officer |
| | | | | | Automated Clearing House (ACH) | | This Control allows the financial institution to record that a death notification was received for an accountholder, and that the correct procedures were followed when reviewing the account | | Compliance Officer, Operations |

| | F7 | | | | | fx | Review a Deposit Advertisement | | | |

| | A | B | C | D | E | F | G | H | I |
|---|---|---|---|---|---|---|---|---|---|
| 1 | Do we Monitor? | Where? | Who? | How Often? | SmartFolder Name | Control Name | Control Objective | Schedule | Assigned(s) |
| 16 | | | | | Appraisal and Evaluations Program | Monitor Compliance with Appraisal and Evaluation Requirements | This Control determines and documents whether the institut program is in compliance with regulatory requirements and Interagency Appraisal and Evaluation Guidelines. | | |
| 17 | | | | | Appraisal and Evaluations Program | Record Appraisal or Evaluation Deferral | This Control records deferral and subsequent receipt of an appraisal or evaluation. | | |
| 18 | | | | | Appraisal and Evaluations Program | Record Temporary Appraiser Waiver Application | This Control allows the financial institution to record the temporary appraiser waiver application submitted to the Appraisal Subcommittee (ASC) of the FFIEC. | | |
| 19 | | | | | Appraisal and Evaluations Program | Record Temporary Appraiser Waiver Application - FFIEC Decision | This Control allows the financial institution to record the Fed Financial Institutions Examination Council's decision concer the institution's temporary appraiser waiver application. | | |
| 20 | | | | | Appraisal and Evaluations Program | Review a Real Estate Appraisal (Effective 1/1/2020) | This Control documents and determines whether an apprais complies with USPAP requirements and the Interagency Appraisal and Evaluation Guidelines. | | |
| 21 | | | | | Appraisal and Evaluations Program | Review a Real Estate Evaluation | This Control allows the institution to determine and documer whether a real estate evaluation complies with regulatory requirements and the Interagency Appraisal and Evaluation Guidelines. | OnDemand | Compliance Officer |
| 22 | | | | | Audit Program | Monitor Branch Signage Compliance (Branch Visits) | This Control allows the institution to verify that all branch notices are in compliance with regulations and are posted as required. | Every Year | Compliance Officer |
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| | | | | | Automated Clearing House (ACH) | | This Control allows the financial institution to record that a death notification was received for an accountholder, and that the correct procedures were followed when reviewing the account | | Compliance Officer, Operations |

PROPER
PLANNING
PREVENTS
POOR
PERFORMANCE

Risk Assessments | Monitoring & Testing | RegControls | Sheet1 | +

# ControlsBuilder

- Have you ever wanted to customize a Continuity Control?
- Do you maintain and reconcile spreadsheets?
- Are you sending reminders by email?
- Is it difficult to get unified responses?
- Are your processes confusing to end users?

**ControlsBuilder™ is the engine that allows clients to build their own customized procedures and tasks on the Continuity platform. A procedure is known as a Control, and may contain one or more discrete tasks. Each manual task that has been added to the Continuity platform is known as a ToDo.**

★ Order of Operations

★ Creating Dynamic Checklists

# ControlsBuilder

Address (of ATM location): ▮

What type of ATM is at the customer location?  Please check the one that applies.

☐ 1. The ATM **is not** _owned, operated, or serviced by our customer_ (check a or b): **(1)**

    ☐ a. It is a Bank/CU _owned_ ATM machine:

Name of Bank/CU: ▮

No further action is required.  **STOP**

    ☐ b. An ATM contractor is _leasing or renting the space_ within our customer's location.  The ATM is not owned or serviced by our customer and our accounts are not being used to provide cash for the ATM or to settle ATM activity:

Name of ATM contractor / describe the nature of the agreement between our customer and the ATM owner: ▮

**Upload?**

☐ 2. The ATM **is** _owned, operated, or serviced by our customer_: **(2)**

    a.  *If the ATM is located in ▮, obtain a copy of the approval letter and / or other proof (Schedule Q) that the business has registered the ATM.  Confirm on Division's Website: "Find a Non-Bank ATM", if in ▮

    b.  Obtain a copy of the ATM agreement (purchase, sale, or lease) with the sponsoring entity (ISO).

    c.  Are the accounts used to process the ATM activity maintained with us?

        Yes ☐  No ☐

        _If yes_: Provide the Account(s) # ▮

    d.  How is the ATM cash being replenished / what is the source of funds? (e.g. from store proceeds, armored car, or account withdrawals) ▮
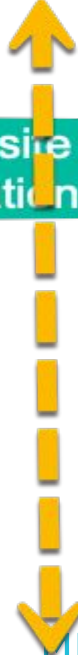
_If the ATM cash is being funded from cash sales or account withdrawals from Bank/CU account:_

    i.  How often is the ATM cash replenished and what is the average amount of cash used for replenishment? ▮

    ii.  What is the expected amount of daily withdrawal activity for the ATM? ▮

**Upload?**

**Link to website & confirmation**

**This is 2 questions**

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# ControlsBuilder

**Outline**

Contact

Customer Information

ATM Information

ATM Not Owned by Customer

ATM is owned, operated, or serviced by our customer

Add Field
Back to top
Preview

---

**Display** — One of your customers has been identified as having transactions that may be associated with having Private ATM on premise. Please review the history tab for customer details needed to perform due diligence.

---

**Fieldset** — Customer Information

---

**Text Input** — * Business Name

---

**Text Input** — * Address (of the ATM location)

---

**Fieldset** — ATM Information

---

**Select** — * Is the ATM at customer location owned by the customer or an outside entity?

ToDoScript ID:
type

Choices:
ATM is not owned by customer, ATM is owned by customer

---

**Fieldset** — ATM Not Owned by Customer

ToDoScript ID:
notowned

ToDoScript Data:
{"show-if":
{"id":"type","condi
tions":{"eq":"ATM

---

- [Adding Video](#)
- [Formatting Text](#)
- [Available Form Field Types](#)

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# ControlsBuilder

## Private ATM Due Diligence

Address (of the ATM location)*

### ATM Information

Is the ATM at customer location owned by the customer or an outside entity?*

ATM is not owned by customer

### ATM Not Owned by Customer

Is the ATM on premise a Bank/CU owned ATM machine or is an ATM contractor leasing/renting the space?*

Contractor Lease

Name of the ATM contractor

The ATM is not owned or serviced by our customer and our accounts are not being used to provide cash for the ATM or to settle ATM activity.

Describe the nature of the agreement between our customer and the ATM owner

Save for Later

---

## Private ATM Due Diligence

ATM is owned by customer

### ATM is owned, operated, or serviced by our customer

Obtain a copy of the ATM agreement(purchase, sale, lease) with the sponsoring entity (ISO)*

Required Field

Choose File   No file chosen

Are the accounts used to process the ATM activity maintained with us?*

How is the ATM cash being replenished/what is the source of funds?

How often is the ATM cash replenished and what is the average amount of cash used for replenishment?

What is the expected amount of daily withdrawal activity for the ATM?

Save for Later   Done

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**VendorComply**

# VendorComply

Our cloud-based VendorComply tool helps ensure that you're managing compliance for your third-party vendors in a way that is time and cost effective. Our simple, yet powerful technology provides executive oversight and reporting to reduce risk exposure from third-party relationships.

- Assess vendor risk before and during engagement

- Contract review

# VendorComply



**Review a New Contract**                                                    ✕

Instructions  〉  Record  〉  Legal  〉  **General** 〉 Controls 〉 BCP 〉 Termination 〉 Regulatory 〉 Recommendation

## General Provision Review

Please answer all of the following general provisions questions

Scope of Service. Does this contract clearly describe the rights and responsibilities of the parties to the contract?

○ Yes

○ No

Considerations should include: (1) Descriptions of required activities, timeframes for their implementation, and assignment of responsibilities. Implementation provisions should take into consideration other existing systems or interrelated systems to be developed by different service providers (e.g., an Internet banking system being integrated with existing core applications or systems customization); (2) Obligations of, and services to be performed by, the service provider including software support and maintenance, training of employees, or customer service; (3) Obligations of the financial institution; (4) The contracting parties' rights in modifying existing services performed under the contract; and (5) Guidelines for adding new or different services and for contract re-negotiation.

Performance Standards. Does this contract include performance standards that define minimum service level requirements and remedies for failure to meet standards in the contract?*

○ Yes

○ No

For example, common service level metrics include percent system uptime, deadlines for completing batch processing, or number of processing errors. Industry standards for service levels may provide a reference point. The institution should periodically review overall performance standards to ensure consistency with its goals and objectives. If the interoperability of systems is critical to providing the contracted service, this should also be addressed. Also see the Service Level Agreements section in this FFIEC Outsourcing Technology Services booklet.

Security. Does the contract address the service provider's responsibility for security of the institution's resources? Does

[ Save for Later ]  [ Save and Continue > ]

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# VendorComply

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# Live Q&A with Our Product Experts

# First Hope Bank NA

Cara L. Quick, CRCM, CAFP
VP, Compliance, BSA, and CRA Officer

- Products used

- Why did you choose Continuity?

- How did you implement the program?

- What was the rollout methodology?

- Do you report this information to a committee and/or Board?

- Anything else you would like to share?

# Morton Community Bank

Maria Warner, MBA, CRCM, CAFP
SVP, Chief Compliance Officer

- Products used

- Why did you choose Continuity?

- How did you implement the program?

- What was the rollout methodology?

- Do you report this information to a

  committee and/or Board?

- Anything else you would like to share?

**Questions & Inquiries**

**Stephanie Fox
CCBCO, CCBRS**

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**Meet the Team**

**Ryan Fox**

GRC Sales Manager

**Jared Howe**

Solutions Consultant

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# A Comprehensive Look Into: Mitratech's GRC Platform of the Future

## Alyne
### All-In-One GRC Platform
Cloud-native platform, powered by AI and machine learning, with cross-industry applications designed to offer support across the full GRC lifecycle.

## Continuity
### Compliance - Risk - Expertise
Automated regulatory change management and risk solutions for the financial services industry, continuously updated by subject matter experts.

## ClusterSeven
### MRM - IT - EUC
Powerful capabilities for delivering comprehensive MRM, IT, and EUC initiatives rapidly and efficiently.

## Policy Management
### Policy
Streamline vital tasks involved in policy management with easy-to-use technology.

## VendorInsight
### TPRM - Vendor
Best-in-class TPRM software to manage your entire vendor lifecycle, backed by expert vendor review services to keep your program compliant.

## Integrum
### QHSE - Risk - Compliance
Fully centralized and integrated capabilities for QHSE, risk, and compliance.

## DataStore
### ECM
Robust ECM system for the financial services industry. Gain complete control of business critical information.

## Compliance Manager (CMO)
### Compliance - Risk
Unparalleled insights into compliance obligations and regulatory requirements.

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**MITRATECH** | Governance, Risk & Compliance

★ **VendorInsight**

★ **PolicyHub**

★ **Alyne**

# MITRATECH | Vendor**Insight**

# Vendor**Insight**

# VendorInsight LifeCycle

**1**

**Contract/Vendor Record**

Track Vendor Data
Classify Relationships
Centralize Documents

Single Source of Truth for Vendor Relationships

**2**

**Vendor Relationship Inherent Risk**

Identify Risk Factors
Drive Due Diligence
Score Inherent Risk

Automated Vendor Management Policy

Policy Compliance Requirements Matrix (PCM)

**3**

**Due Diligence Documentation & Analysis**

Track Compliance
Vendor Portal
Analysis Tool & Services

Efficient, Consistent Due Diligence Management

**4**

**Residual Risk Assessment**

Comprehensive
Collaborative
Configurable

Enable Effective Risk-Based Management

**5**

**Vendor Performance Scorecard**

Configurable
General Scorecard
Score SLAs

Score & Track Vendor Performance Easily

**6**

**Continuous Monitoring**

Monitor News & Risk
**Optional**: Cybersecurity Monitoring

Automated Risk Awareness

**Collaboration Workflow**

**Approval Workflow**

**Issues and Remediations**

Initial onboarding and Annual Management

# VendorInsight Value Drivers

## Reduce vendor management costs

Customers save millions by having the increased insight to cancel agreements before they auto-renew and receiving alerts when it's time to renegotiate a contract

## Centralize vendor management efforts

Have a single source of truth for vendor contracts, documentation, vendor risk analysis reports and more. Reduce risk from 3rd and 4th party vendors with vendor data in a single, centralized solution.

## Effectively scale vendor management programs

Grow a vendor management program from the ground up so it's not just compliant, but robust. Automated processes makes it easy for VendorInsight to grow with the size of the vendor network
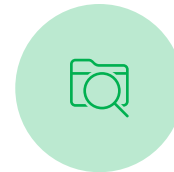
## Ensure industry regulatory compliance

VendorInsight helps customers meet the demands of an increasingly stringent regulatory environment and satisfies auditors.

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# MITRATECH | PolicyHub

# PolicyHub

# Policy Management Lifecycle

## 1. Develop
Automated collaboration, workflow, and approval
Remove manual efforts

## 2. Review
Automated collaboration, workflow, and approval
*"Set it and forget it"*

## 3. Publish
Distributed to target groups, departments, groups or regions

## 4. Attestation
Presented with policy, asked to read it, complete it and
confirm acceptance.

## 5. Knowledge Assessment & Questionnaires
Ability to gain knowledge assessment levels against policies
Utilize questionnaires gain visibility into policy compliance

## 6. Report / Audit
More granularity in reporting and audit trail capabilities

# Better Design to Save You Time

**1** End User Ease of Use
Collaborative Work Environment

**2** Workflow Simplification
Increased Efficiencies

**3** Document Control
Data Centralization

**4** Direct Publications
Clearer Employee Communication

**5** Reporting
Defined Audit History

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# Key Use Cases

★ **Risk Management**

AI-driven risk management end-to-end, from identification and qualification, to quantification

★ **InfoSec Management**

Develop and implement an information security management system aligned with ISO 27001

★ **Internal Controls**

ICFR control set along with business and IT controls to gain assurance on your financial integrity

★ **Regulatory Implementation**

Easily implement a vast number of global standards and regulations across your organization

★ **Operational Risk**

Manage operational risk through RCSA's and deep risk analytics

★ **Compliance**

Measure levels of compliance across your organisation through assessments and continuous controls monitoring

★ **Vendor Risk management**

Setup effective and highly scalable vendor assessments and manage third party risk, all-in-one.

★ **Data Privacy**

Develop a baseline for data privacy and make current privacy risk exposure transparent.

★ **ESG Risk Framework**

Assess and manage ESG risk exposure and maturity against 16 megatrends and 95 subtrends

★ **Cyber Security Assessments**

Identify weaknesses in your cybersecurity and gain actionable insight for mitigation, ensuring cyber resilience.

★ **Facility Inspections**

Evaluate locations through collaborative assessments to ensure adequacy of physical controls

★ **BCM**

Launch modern business continuity management (BCM/BCP) capability aligned with ISO 22301.

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# Business Continuity

- Define Departments, Processes, Locations, etc.

- Identify Dependencies and Key Points of Failure

- Conduct a Business Impact Assessment

- Manage Risks & Issues
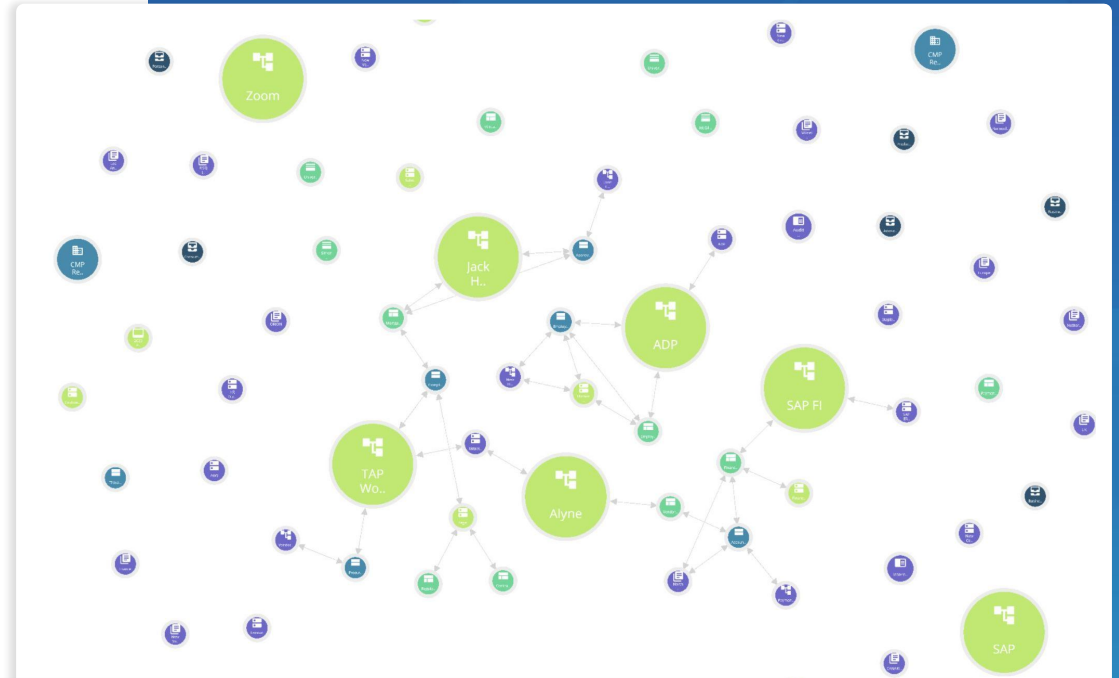


| Title | Process Owner | Criticality ↑ |
|---|---|---|
| Compliance Reporting | Jared Howe | Business Essential |
| Updating Customer Related Data | Tyler Gowen | Critical |
| Accounts Payable | Jared Howe | Critical |
| Employee Orientation | Jonathan Dedman | Critical |
| Third-Party Contracting | Tyler Gowen | Critical |
| Approval Letter | Jared Howe | Important |
| Procurement | Varun Ghai | Important |

# Business Continuity

- **Highly Flexible**
  - Quickly Tailored to Your Institution

- **Very User-Friendly**
  - Engage Stakeholders Collaboratively

- **Easy Insights**
  - Better Decision-Making
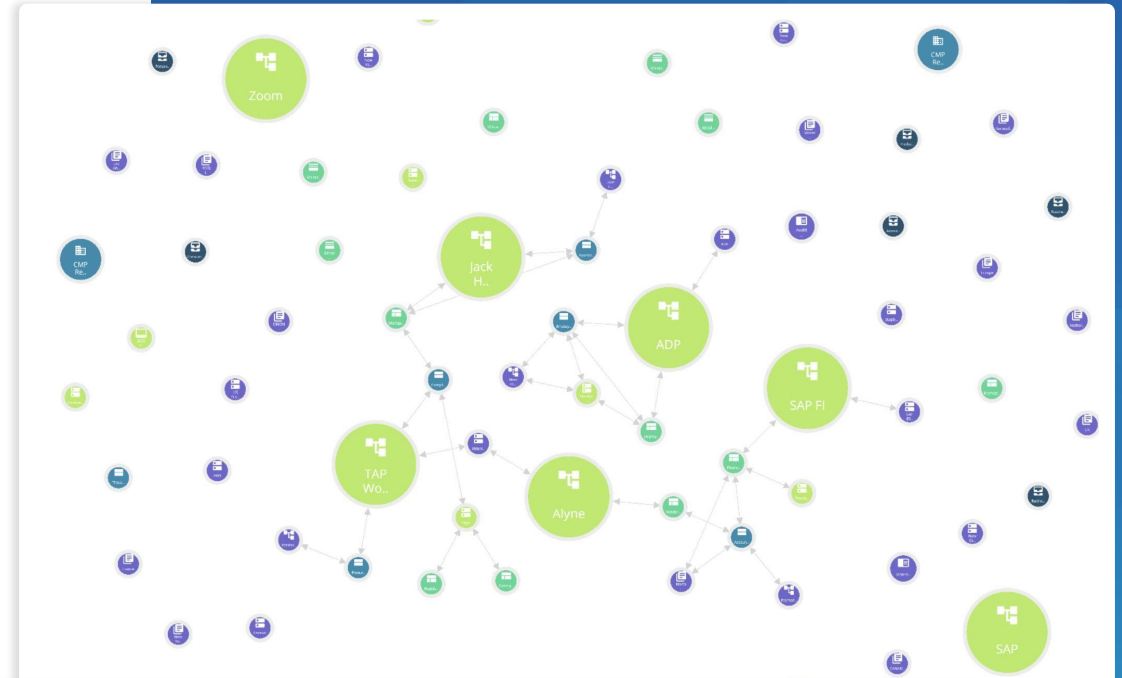


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# Q&A

To view the answers to the below questions asked during this Continuity User Group CLICK HERE

- Do we anticipate other regulators to follow suit when FDIC changes their signage ruling?
- Are there going to be RegControls over Appraisal Bias or existing Reg Controls updated for this?
- Reg E cites related to TPSP
- FDIC Representment Focus/Overdraft Fees
- Can you please provide some regulatory information on NSF and Overdraft Fees?