

Business Continuity Planning

Banking Case Study and FFIEC regulation

26 August 2009

Agenda

- Large sized bank
 - Project overview
 - Strength of plans
- FFIEC
 - Management issues
 - Continuing focus
 - New section of handbook
 - Changes to the appendices

Project overview – gap analysis

- The Bank provided 1007 various planning documents for review between 02 – 26 Feb 2003.
- Documents included BCP, DRP and CMP for the overall wide area network, local area networks and work area recovery.
- The consultants then categorized the documents to prepare for the next phase.

Project overview (continued)

Document category & number of each

- Third party Vendor Information - 14
- BC/DR Documents (382 plans) - 450
- BIA - 342
- Diagrams - 22
- Miscellaneous - 75
- Procedure / Instruction - 13
- Quality reviews - 17
- Risk Assessments - 23
- Templates - 13
- Testing Documents - 29
- Y2K - Nine
- Total - 1007

Strength of plans

- 60% of plans reviewed were rated green or yellow.
- 64% of plans reviewed had an RTO (recovery time objective) specified and were considered green or yellow rating.
- 67% of plans reviewed had a recovery location and were considered green or yellow rating.
- 52% of plans reviewed had some documented telecommunication recovery procedures and were considered green or yellow rating.
- 59% of in scope plans had management contacts listed.
- 65% of in scope plans had Functional Teams listed.
- 71% of in scope plans had declaration/activation procedures.
- 65% of in scope plans had issue escalation procedures.
- 65% of in scope plans had third party suppliers identified.

••• FFIEC, management issues

- Enterprise-wide involvement in planning process
- Importance and level of criticality of all internal and external processes
- Lessons Learned from financial institutions during Hurricanes Katrina and Rita
- Pandemic planning

❖❖❖ FFIEC, continuing focus

Critical functions:

- Technology (which has always been the primary focus with FFIEC)
- Business operations
- Testing (now includes the Federal Reserve Bank testing guidance)
- Communication BCP strategies

••• FFIEC, new section of handbook

Other policies, standards and processes:

- Security standards
- Project Management
- Change control policies
- Data synchronization procedures
- Crisis management
- Incident response
- Remote access
- Employee training
- Notification standards
- Insurance
- Government and community-related issues

❖❖ FFIEC, changes to the appendices

- FRB testing guidance
- New terminology in the Glossary
- Problems from Hurricanes Katrina and Rita
- Pandemic Planning
- Telecommunications issues and interdependencies
- BIA processes and framework
- BCP components
- Laws, regulations and guidance changes

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