

OCC Mutual Savings Association Advisory Committee Third-Party Relationships: Risk Management Guidance Overview

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Third-Party Relationship

Broadly defined: A third-party relationship is any business arrangement between the bank and another entity, by contract or otherwise.

Generally, this does not include customer relationships.

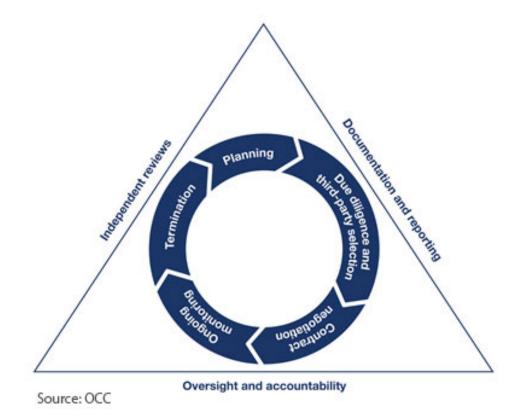


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- Risk management practices for third-party relationships involving <u>critical activities</u>
- Risk management practices <u>throughout the lifecycle</u> of a third-party relationship
- Expectations for board and management <u>oversight</u> that include periodic, independent reviews of the bank's third-party risk management function.



Third-Party Risk Management Lifecycle





Third-Party Relationships Lifecycle Phases

| Phase | Description | Guidance |
|---|--|---|
| Planning | Management planning is the first step in the lifecycle, particularly when critical activities are involved | Discusses what the management plan should address |
| Due Diligence and Third Party Selection | In-depth review of potential third parties prior to final selection and contract negotiation | Discusses the key factors to consider when conducting third-party due diligence |
| Contract Negotiation | Establishes responsibilities and performance requirements | Discusses key factors the contract should address |
| Ongoing Monitoring | Monitoring of performance and compliance throughout the duration of the contract | Discusses key areas of consideration in ongoing monitoring |
| Termination | Plans to cease the activity, bring the activity in house or move to another third party at the end of the contract or when circumstances warrant | Discusses what a termination plan should cover |



OCC Supervision

- Examiners will assess the bank's ability to oversee and manage the risks of its third-party relationships.
- Examiners will consider the findings when assigning the management component of CAMELS and assessing the bank's overall risk profile, and will incorporate into the Risk Assessment System.
- When circumstances warrant, the OCC may use its authority to examine the third-party service provider.