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# Building a Risk Management Program JENGA Style



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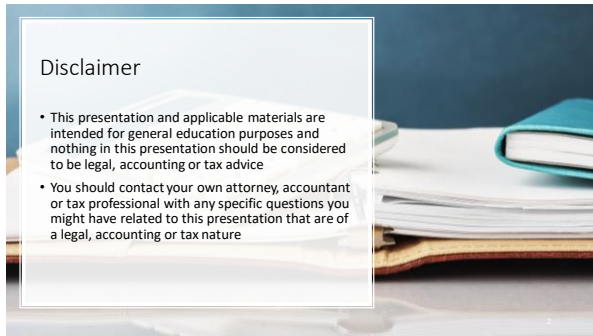
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Polling Question

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- What risk management program(s) does your organization have in place? Mark all that apply
  - ACH Risk Management
  - Cybersecurity Risk Management
  - Vendor Risk Management
  - Merchant RDC Risk Management
  - BSA/AML Risk Management
  - Wire Transfer Risk Management
  - RTP Risk Management
  - Treasury Services Risk Management



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Polling Question

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- Where do you go to find more information about your risk management program? Mark all that apply.
  - The FFIEC
  - My Payments Association
  - The TPPPA
  - AFP
  - My Internal Risk Officer
  - NIST
  - NCSA
  - My TPSP that offers my risk management platform



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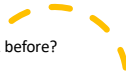
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Polling Question

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- Have you played JENGA before?
  - Yes
  - No
  - I don't know



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### Key Take A-ways



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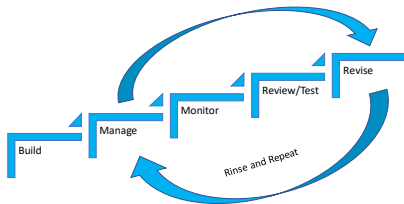
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### Risk Management Program



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JENGA Style

Let's Build a Risk Management Program!



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Risk Management



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Solutions Payments Conference - 2021

The Payments Experience

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It Continues

DEPARTMENT OF THE TREASURY  
Office of the Comptroller of the Currency  
OCC/OP-1002  
(Notice BY OCC-2020-003)  
RISK-1002

FEDERAL RESERVE SYSTEM  
OCC/OP-1002  
(Notice No. 10-1)  
RISK-1002-01

FEDERAL DEPOSIT INSURANCE CORPORATION  
OCC/OP-1002  
RISK-1002-01

Computer Security Incident Notification Requirements for Banking Organizations and Their Bank Service Providers

AGENCY: The Office of the Comptroller of the Currency, Treasury (OCC); the Board of Governors of the Federal Reserve System (Board); and the Federal Deposit Insurance Corporation (FDIC).

ACTION: Notice of proposed rulemaking.

SUMMARY: The OCC, Board, and FDIC, together, the agencies, invite comment on a notice of proposed rulemaking (proposed rule or proposal) that would require a banking organization to provide its primary federal regulator with prompt notification of any "computer security incident" that rises to the level of a "notification incident." The proposed

Solutions Payments Conference - 2021      The Payments Experience      12

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Identify, Protect, Detect, Respond, Recover



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Risk Management Program Controls



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- Policy
  - Identify Risks
  - Approved by BOD (Annually or a shift of environment)
  - "What" to Mitigate Risks

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- Procedures
  - All Inclusive of Activities
  - "How" from "What" Policy Stated
  - Reviewed (Periodically or shift in environment)

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- Reports
  - Tell Your Story
  - At-A-Glance Control Effectiveness
  - Stay Informed

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- Processes & Practices
  - Culture of Compliance
  - Routine/Schedule
  - Connected P & Ps

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Risk Management Program Controls

- Products
  - Vendors/TPSP
  - Solutions
  - Legal and Regulatory Protection

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Risk Management Program Controls

- Risk Assessment
  - Identify Inherent Risks
  - Performed Repeatedly Based on Level of Risk
  - Assess Effectiveness of Controls

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Risk Management Program Controls

- Audit
  - Test Controls - Operating as Intended
  - Compliance
  - Necessary Remediation of Control

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Risk Management Program Controls

- Reviews
  - Vendor Risk Management
  - Corporate Customer Risk Review
  - Security and Data Risk Reviews

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Risk Management Program Controls

- People
  - Training/Education
  - Dispensable
  - Experience



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Questions?

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