

Summary Table of Contents

Volume I

- Chapter 1 Getting Started
- Chapter 2 Internal Controls and Their Basic Objectives
- Chapter 3 Designing Internal Control Systems
- Chapter 4 Managing the Internal Control Process: Developing and Maintaining a Formal Internal Control Environment
- Chapter 5 Monitoring Internal Controls
- Chapter 6 [The contents of this chapter have been moved to Volume II.]
- Chapter 7 Examination of Internal Controls by Independent Third Parties
- Chapter 8 Planning for the Future
- Chapter 9 Outsourcing and Internal Control Considerations
- Appendix

Volume II: Internal Control Checklists

- Executive
- Lending
- Treasury/Finance
- Trust
- International Banking
- Operations
- Data Processing

Contents

About the Authors	iii
How to Use This Manual.....	v
Summary Table of Contents.....	xiii

Volume I

Chapter 1 Getting Started

Internal Control — the Focus	1 — 1
Internal Control — by Definition	1 — 3
Critical Components.....	1 — 3
Control Environment.....	1 — 4
Risk Assessment.....	1 — 5
Control Activities	1 — 6
Accounting, Information, and Communication Systems	1 — 7
Self-Assessment	1 — 8
Period-End Reporting Process Controls.....	1 — 8
General Computer Controls	1 — 10
Organizational-Level Controls.....	1 — 10
Regulatory Perspective	1 — 10
Addressing Fraud	1 — 11
Application/Mortgage Fraud.....	1 — 11
Credit Reports Fraud.....	1 — 12
Title Insurance Fraud	1 — 12
Appendix	1 — 13

Chapter 2 Internal Controls and Their Basic Objectives

Reflecting on Problem Banks in the 1980s	2 — 1
Importance of Internal Controls	2 — 2
Risk.....	2 — 2
Credit Risk	2 — 3
Interest Rate Risk	2 — 5
Liquidity Risk.....	2 — 6
Price Risk	2 — 7

Foreign Exchange Risk	2 — 8
Transaction Risk	2 — 9
Compliance Risk	2 — 9
Strategic Risk	2 — 11
Reputation Risk	2 — 11
Litigation Risk	2 — 12
Risk Summary	2 — 13
So What Is Internal Control?	2 — 13
Internal Control Defined	2 — 14
Internal Controls in Certain Regulations	2 — 15
Board of Director and Senior Management Responsibility	2 — 17
General Goal of Internal Controls	2 — 18
Internal Control Components	2 — 19
Risk Management, Internal Controls, and Corporate Governance	2 — 21
Risk Management Elements	2 — 22
Exhibit 2.1: Internal Control Quality Checklist	2 — 24

Chapter 3

Designing Internal Control Systems

Design Philosophies	3 — 1
Responsibility	3 — 2
The Five Components	3 — 2
Control Environment	3 — 3
Who Is Responsible	3 — 4
Control Environment Insights	3 — 5
Credit Culture	3 — 6
Risk Assessment	3 — 7
Control Activities	3 — 7
Accounting, Information, and Communication Systems	3 — 8
Self-Assessment or Monitoring	3 — 8
Internal Control System Design Approach	3 — 9
Practice Scenario — Implementing Regulation Z	3 — 9
Control Environment	3 — 10
Risk Assessment	3 — 11
Control Activities	3 — 13
Start with the Basics	3 — 14
Executing Compliance Requires Clear Direction	3 — 15
Specific Written Operational Procedures Help Control Risk	3 — 16
Accounting, Information, and Communication Systems	3 — 18
Regulation Z Reporting — Different Types of Communication	3 — 18
Self-Assessment or Monitoring	3 — 19
Ongoing Monitoring for Success	3 — 19
Ensuring Efficiency and Effectiveness	3 — 20
Exhibit 3.1: Regulation Z Risk Assessment Table	3 — 22
Exhibit 3.2: Risk Assessment Table	3 — 25
Exhibit 3.3: Risk and Existing Control Assessment Table	3 — 26

Chapter 4
Managing the Internal Control Process:
Developing and Maintaining a Formal Internal Control Environment

Corporate Governance Commitments to Internal Controls	4 — 1
Sarbanes-Oxley Act and Corporate Governance Equals Internal Controls.....	4 — 1
What Is Corporate Governance?	4 — 2
Insights	4 — 2
Definitions.....	4 — 3
Best Practices for Corporate Governance	4 — 4
OCC Provides Guidance on Corporate Governance	4 — 5
Specific Review of Sarbanes-Oxley Act.....	4 — 5
Applicability of Certain Provisions of the Sarbanes-Oxley Act of 2002 to Institutions That Are Not Public Companies and Are Less Than \$500 Million Total Assets	4 — 8
Title I — Public Company Accounting Oversight Board.....	4 — 8
Title II — Auditor Independence.....	4 — 8
Title III — Corporate Responsibility	4 — 11
Title IV — Enhanced Financial Disclosures.....	4 — 12
Applicability of Certain Provisions of the Sarbanes-Oxley Act of 2002 to Institutions with \$500 Million or More in Total Assets.....	4 — 15
Auditor Independence.....	4 — 15
Management’s Responsibility for Financial Reporting and Controls.....	4 — 17
Management’s Assessment of Internal Controls and Accountant’s Attestation on This Assessment.....	4 — 18
Other Provisions of the Sarbanes-Oxley Act	4 — 18
Cost of Compliance Concerns.....	4 — 18
Information Technology (IT) Effects on Internal Controls.....	4 — 19
Risk Scoring System.....	4 — 22
Risk-Based Internal Control Audits	4 — 23
Summary	4 — 23
Additional Guidance Regarding Sarbanes-Oxley Act Section 404 Attestations.....	4 — 24
Background.....	4 — 24
Requirements of Section 404	4 — 24
Registered National Banks.....	4 — 25
Registered Holding Companies	4 — 25
Tools for Evaluating Section 404 Compliance	4 — 25
Additional Section 404 Questions and Answers Posed by the OCC	4 — 27
Additional Information	4 — 29
Revised Auditing Approach per Audit Standard No. 5.....	4 — 29
Stand-Alone Internal Control Policy vs. Minimum Subset of All Internal Policies.....	4 — 31
Nature and Scope of Internal Control Policy.....	4 — 32
Process Focus on Checks and Balances	4 — 32a
Minimum Procedures Guidance with Respect to Risk Points	4 — 33
Documentation of Internal Control Points as Part of Data Flow.....	4 — 33
Risk Assessments and Internal Controls	4 — 36
Background	4 — 36
Control Environment and Procedures	4 — 36
Preliminary Assessment of Control Risk	4 — 39

Training Staff on the Value of Internal Controls.....	4 — 40
Exhibit 4.1: Sample Internal Control Policy Statement (for inclusion in other policies)	4 — 42
Exhibit 4.2: Sample Internal Control Policy	4 — 44
Exhibit 4.3: Sample Internal Control Procedures	4 — 54
Exhibit 4.4: Internal Control Procedures	4 — 65
Exhibit 4.5: Sample Internal Control Documentation Worksheet	4 — 84
Exhibit 4.6: Internal Control Documentation Worksheet	4 — 88
Exhibit 4.7: Sample New Product/Service Worksheet.....	4 — 94

Chapter 5

Monitoring Internal Controls

Establishing a Monitoring Process	5 — 1
Initial Monitoring	5 — 1
Ongoing Monitoring.....	5 — 2
Self-Assessment.....	5 — 3
Independent Audit.....	5 — 3
How and Why to Monitor Internal Controls	5 — 4
Managing the Review Process	5 — 4
The Impact of Quality Controls in Daily Operations	5 — 5
Scheduling Periodic Reviews.....	5 — 6
Planned Reviews	5 — 6
Unplanned Reviews	5 — 7
Reporting the Findings of an Internal Assessment.....	5 — 7
Mandatory Follow-Up on Internal Control Exceptions.....	5 — 9
Exhibit 5.1: Sample Internal Control Advisory Memo and Monitoring Review Procedures.....	5 — 10
Exhibit 5.2: Sample Internal Control Analysis Worksheets	5 — 22
Exhibit 5.3: Sample Internal Control System Monitoring Schedule.....	5 — 29
Exhibit 5.4: Sample Internal Compliance Review Report	5 — 31
Exhibit 5.5: Sample Follow-Up on Internal Control Exceptions	5 — 32

Chapter 6

[The contents of this chapter have been moved to Volume II.]

Chapter 7

Examination of Internal Controls by Independent Third Parties

Where to Begin.....	7 — 1
Regulatory Reviews — What to Expect.....	7 — 1
Scope of a Review	7 — 2
Examiner Focus	7 — 3

Key Personnel	7 — 3
Segregation of Duties	7 — 4
Accounting and Administration	7 — 5
Deviations	7 — 5
Computer Operations	7 — 6
Five Components of Internal Control Systems	7 — 6
Control Environment.....	7 — 7
Risk Assessment	7 — 8
Control Activities.....	7 — 9
Accounting, Information, and Communication Systems	7 — 10
Self-Assessment and Monitoring	7 — 11
Risk Management.....	7 — 13
Credit Risk	7 — 13
Interest Rate Risk	7 — 14
Liquidity Risk	7 — 14
Price Risk	7 — 14
Foreign Currency Transaction Risk	7 — 15
Transaction Risk	7 — 15
Strategic Risk	7 — 15
Compliance Risk.....	7 — 15
Reputation Risk.....	7 — 16
Risk Assessment Matrixes	7 — 16
Working with Examiners.....	7 — 16
Regulatory Issuances	7 — 17
Consultants	7 — 17
Accountants and External Auditors	7 — 17
Exhibit 7.1: Internal Control and Audit	7 — 19
Exhibit 7.2: Loan Portfolio Management and Review: General	7 — 20
Exhibit 7.3: Risk Indicators	7 — 21

Chapter 8 Planning for the Future

Anticipated Change	8 — 1
Strategic Plan	8 — 1
Increasing Assets.....	8 — 2
Expansion of the Work Force	8 — 2
Upgrading, Consolidating, or Replacing the Bank’s Operating Systems	8 — 2
Centralizing Loan or Customer Service Operations	8 — 2
The Offering of a New Service or Product	8 — 3
The Acquisition of a Bank or Bank Holding Company	8 — 3
Opening a New Branch	8 — 3
The Addition of an ATM or a Night Drop Box	8 — 3
Transferring Paper Records to Electronic Records.....	8 — 3
Reducing Overhead Expenses.....	8 — 4
Increasing Noninterest Income	8 — 4
Retirement of the President or Chief Executive Officer	8 — 4

Regulatory Issuances.....	8 — 4
Expecting the Unexpected.....	8 — 5
External and Internal Factors	8 — 5
Bank Merger or Purchase.....	8 — 5
Downsizing	8 — 5
Litigation.....	8 — 5
Competition.....	8 — 6
High Turnover.....	8 — 6
Change in Executive Management	8 — 6
Economic Downturn	8 — 6
Natural Disasters.....	8 — 6
Risk Management.....	8 — 7
Snags.....	8 — 7
Internal Controls Help Control the Future.....	8 — 11

Chapter 9

Outsourcing and Internal Control Considerations

Using Internal Control Checklists	9 — 1
Regulatory Requirements.....	9 — 1
Using internal Questionnaires	9 — 2
General Outsourcing Relationship Internal Control Checklist.....	9 — 4
Outsourced Data Processing Computer Operations Internal Control Checklist.....	9 — 7
Outsourced Information Processing Security Systems Internal Control Checklist.....	9 — 12
Outsourcing Information Backroom Support Processes Internal Control Checklist.....	9 — 15
Outsourcing Customer Services Support Internal Control Checklist.....	9 — 18
Outsourced Network Support Internal Control Checklist	9 — 21
Outsourced Electronic Banking Support Internal Control Checklist	9 — 32
Exhibit 9.1: Risk Management and Strategic Planning Questionnaire	9 — 38
Exhibit 9.2: Selecting a Third Party and Due Diligence	9 — 40
Exhibit 9.3: Security and Privacy.....	9 — 42
Exhibit 9.4: Consumer Protection Policies	9 — 43
Exhibit 9.5: Contract Issues	9 — 44
Exhibit 9.6: IT Outsourcing	9 — 47
Exhibit 9.7: Oversight of the Third-Party Relationship	9 — 48

Appendix

Volume II: Internal Control Checklists

Executive

Board Supervision	Executive — 1
Corporate Governance	Executive — 4
Management Supervision	Executive — 25
Management Information Systems (MIS)	Executive — 27
Insider Activities	Executive — 30
Internal Audit	Executive — 33
Employee Benefits	Executive — 43
Risk Management and Insurance	Executive — 44
Related Organizations	Executive — 46a
Review of Regulatory Reports	Executive — 48
Earnings Analysis of Income and Expense	Executive — 50
Capital Accounts and Dividends	Executive — 53
Advisory Services	Executive — 54
Privacy	Executive — 56
Internal Control Maintenance	Executive — 62
Retail Sale of Insurance Products	Executive — 65
External Auditor Independence Questionnaire	Executive — 68
Annual Report Review	Executive — 74
Bank Facilities — Main Office Review	Executive — 76
Code of Conduct	Executive — 90
Effective Audit Committee	Executive — 96
Human Resources	Executive — 103
General Ledger and Accounting	Executive — 118

Lending

Loan Portfolio Management	Lending — 1
Loan Control Reporting Systems	Lending — 6
Commercial Loans	Lending — 10
Accounts Receivable Financing	Lending — 15
Direct Leasing	Lending — 18
Installment Loans	Lending — 20
Floor Plan Loans	Lending — 26
Check Credit	Lending — 31
Credit Card Plans	Lending — 34
Real Estate Loans	Lending — 41
Real Estate Construction Loans	Lending — 45

Mortgage Banking.....	Lending — 53
Concentration of Credit.....	Lending — 61
Allowances for Loan and Lease Losses.....	Lending — 62
Other Real Estate Owned.....	Lending — 63
Letters of Credit.....	Lending — 65
Subprime Lending Activities.....	Lending — 67
Agribusiness Lending.....	Lending — 77
Trade Financing.....	Lending — 81
Environmental Risk Assessment.....	Lending — 88
Loan Participation.....	Lending — 90
Community Reinvestment Act (Intermediate Small Institutions).....	Lending — 97
Credit Scoring Activities.....	Lending — 112
Real Estate Appraisals and Evaluations.....	Lending — 117
Loans to Insiders.....	Lending — 123
Fair Lending.....	Lending — 127
Problem Loans.....	Lending — 132
Asset Securitization.....	Lending — 137
Credit Risk.....	Lending — 144
Commercial Real Estate and Construction Checklist.....	Lending — 165
Asset Management.....	Lending — 177

Treasury/Finance

Due from Banks.....	Treasury/Finance — 1
Investment Securities.....	Treasury/Finance — 5
Hedging.....	Treasury/Finance — 14
Mortgage-Backed Securities and Derivatives.....	Treasury/Finance — 17
Bank Dealer Activities.....	Treasury/Finance — 20
Borrowed Funds.....	Treasury/Finance — 38
Funds Management.....	Treasury/Finance — 40
Interest Rate Risk.....	Treasury/Finance — 42
Private Placements.....	Treasury/Finance — 45
Discount Brokerage.....	Treasury/Finance — 47
Retail Nondeposit Investment Sales.....	Treasury/Finance — 55
Banker's Acceptance.....	Treasury/Finance — 65
Emerging Market Country Products and Trading Activities.....	Treasury/Finance — 68
Origination and Distribution Activities.....	Treasury/Finance — 73
Trading Activities.....	Treasury/Finance — 78
Equities Activities.....	Treasury/Finance — 82
Modeling and Risk Analysis.....	Treasury/Finance — 91
Outsourcing.....	Treasury/Finance — 93
Custody Services.....	Treasury/Finance — 96

Trust

Management	Trust — 1
Operations	Trust — 5
Mutual Funds.....	Trust — 19
Account Administration — Employee Benefits	Trust — 24
Contingency Planning	Trust — 33
Global Custody.....	Trust — 42
Stock Transfer	Trust — 50
Securities Lending.....	Trust — 59
Personal and Corporate Trust	Trust — 69
Trust Servicer	Trust — 72
Personal Fiduciary Services	Trust — 74
Customer Services.....	Trust — 82
Sale of Retail Insurance Products.....	Trust — 93

International Banking

Management Supervision	International Banking — 1
Deposit Accounts	International Banking — 4
Foreign Exchange.....	International Banking — 9
Foreign Currency Options	International Banking — 14
Financing Foreign Receivables	International Banking — 19
International Loan Portfolio Management	International Banking — 25
International Loans and Current Account Advances.....	International Banking — 30
Origination and Distribution Activities	International Banking — 33
Transfer Risk Checklist	International Banking — 38

Operations

Cash Accounts.....	Operations — 1
Consigned Items and Other Customer Services	Operations — 29
Bank Premises and Equipment.....	Operations — 33
Branch Administration	Operations — 63
Other Assets (and Other Liabilities).....	Operations — 65
Deposit Accounts	Operations — 67
Payment Systems and Funds Transfer Activities (Wire Transfer Department)	Operations — 79
Wire Transfer Compliance	Operations — 90
Interbank Liabilities.....	Operations — 92
Regulatory Reporting	Operations — 95
EDP — Purchased Services.....	Operations — 97
Internet Banking	Operations — 103
Merchant Card Processing Policy	Operations — 108

Records Retention	Operations — 115
Automated Clearing House (ACH)	Operations — 117
Centralized Purchasing	Operations — 128
Retail Payment Systems	Operations — 138
Data and Records Destruction	Operations — 150
Debit Card	Operations — 154
Irregularities and Illegal Acts: Investigation	Operations — 154h
Disaster Recovery with Regards to Power	Operations — 155
Information Attacks	Operations — 158
Remote Deposit Capture	Operations — 167
Prepaid Cards	Operations — 180
Controls Review	Operations — 190
Contingency Planning	Operations — 213
Teller Operations	Operations — 236

Data Processing

Data Processing Management Controls	Data Processing — 1
Data Processing Computer Operations	Data Processing — 4
Data Processing Systems Development and Programming	Data Processing — 8
Data Processing Security Systems	Data Processing — 11
Data Processing Balancing Processes	Data Processing — 14
Data Processing Customer Services	Data Processing — 18
Document Imaging	Data Processing — 20
Networks	Data Processing — 26
Electronic Banking	Data Processing — 36
Intrusion Risks	Data Processing — 43
Fedline EFT	Data Processing — 47
Wholesale or Large Dollar Funds Transfer Systems	Data Processing — 49
Data Management Policy	Data Processing — 57
Online Privacy	Data Processing — 62
Information Security	Data Processing — 66
Contracting with Vendors	Data Processing — 82
Internet Access	Data Processing — 89
E-Mail Systems	Data Processing — 99
Forms Design	Data Processing — 104
Data Processing Audit	Data Processing — 109
Electronic Banking Information Authentication	Data Processing — 116
Server Security	Data Processing — 122
Firewalls	Data Processing — 128
Data Collection Security	Data Processing — 133
Encryption Methodologies (Aspects of Encryption)	Data Processing — 135
Certification Authority (CA)	Data Processing — 138
Security Assessment (Penetration Testing and Vulnerability Analysis)	Data Processing — 140
Assessment of Telecommunication Environment	Data Processing — 142
System Availability	Data Processing — 148
Controls Review	Data Processing — 157

Outsourcing Information Security..... Data Processing — 181

