

The Framework of Third-Party Risk Management (TPRM)

Risk Mindset

Compliance Risk

Compliance Considerations- Stephanie Lyon
Regulatory Guidance for TPRM

Interagency Guidance

Definition
Risk Management
Life Cycle
Governance
Supervisory Review

NCUA Guidance

Third Party Relationships
Planning & Risk Assessment
Financial Projections
Due Diligence
Risk Management
Part 748

CFPB Guidance

Expectations
TP & UDAAP

FFIEC Guidance

Expectations

TPSP & Gramm Leach Bliley Act (GLBA)

Compliance
Basics

PCI DSS Responsibilities

Definition
Requirements
Managing Risk
Other Rules
Certifications

Contractual Risk

Review
Responsibility
Recourse

General Data Protection Regulation (GDPR)

What and Who
Definitions
Requirements
Fines

Operational/Transactional Risk

Definition
Risk Exposure

Concentration Risk

Over Reliance
Geographic Concentration
Cloud Centration
Subcontractor

Reputation Risk

Risk Exposure
Environmental, Social, and Governance Risk
Risk Mitigation

Strategic Risk

Strategic Risk & TP Life Cycle
Risk Considerations

Credit Risk

Potential Impact
Considerations
Timing

Program Elements

Policy Requirements

Oversight
Components
Digital Assets

Culture Mindset

Culture & TP Management
Culture Evolution
Considerations for Culture

The Three Lines & TPRM

First Line
Second Line
Third Line

A Guide to Organizational Involvement- TPRM Roles

Vendor Owners/Stakeholders
TPRM Program Requirements
Senior Management & Board Oversight
Teamwork & TPRM
Internal Audit
IT/Information Security

Third Party Classification

The Why
Classify by Potential Impact
Classify by Data Access
Tier Classifications
Best Practice Framework

Program Evaluation

Exam and Audit Preparation- Rafael DeLeon

Best Practice Reporting

Onboarding Reporting
Ongoing Monitoring
Insurance & Licensing
Incident Reporting
TP Complaint
Gap Identification
Key Risk & Performance Indicators

The Intersection Points of TPRM

Business Continuity & TPRM

Continuity Partners
Reliance vs Resiliency
Hosting Types
Due Diligence Documents
Business Impact Analysis
Crisis Management & Disaster Recovery
Pandemic Planning
Pandemic & Contracts
Remote Work

Incident Response & Third Parties

Defining Incidents
Response
Policy/Plan
Partnering with TP
Risk Considerations
Responding to a TP Incident
Postmortem
Incident & Breach Notification

Data Governance and Protection

Data Governance and Protection

Data Definitions
Access Controls
Cloud Security & Hosting
Agreements & Policies

Data & Cyber Security- Jon Bowker & Frank Fede

Subcontractor Risk & Responsibilities

Responsibilities
Risk Mitigation

Partnering with Fintech

Regulatory Guidance
Mitigating Risk with Due Diligence
Alignment of Strategic Vision

Vendor as a Control- Michael Carpenter

Third-Party Risk Management (TPRM) Life Cycle

Planning & Due Diligence/Third Party Selection

Planning & Due Diligence

Strategies & Goals
Legal & Regulatory Compliance
Financial Condition
Business Experience
Qualifications & Background
Risk Management
Information System & Management of
Operational Resilience
Insurance
Subcontractors
Incident Reporting
Physical Security

Cost Benefit Analysis

Regulatory Guidance
Framework
Cost & Benefit

Request for Proposal

Contract Negotiation

Structure & Review
Term and Termination
Business Resiliency and Audits
Confidentiality & Security
Miscellaneous Contract Provisions
Different Vendor Types

Ongoing TPRM Monitoring and Due Diligence

Ongoing Monitoring

Purpose & Timing
Regulatory Expectations
Document Collection
Organizational Involvement

Tracking Service Disputes and Incidents

Outsourcing

Reasons to Outsource
Responsibilities & Risk
Pricing
Foreign Based Providers

Third Party Off Boarding

Relationship Evaluation

Considerations
Benefit of Exploring Options

Planning to Exit

Considerations
Contract & Exit Notice
Data Destruction & Securement

Deep Dive into the Documents of TPRM

SSAE 18/SOC

SOC 1 vs. SOC 2 vs. SOC 3

A Tour around a SOC- Cathy Ryan

SOC 2 Trust Services Categories

SOC 2 Reports
Trust Services Criteria
Security
CC6 : Logical and Physical Access
CC7: System Operations
CC8: Change Management
CC9: Risk Mitigation
Availability
Process Integrity
Confidentiality
Privacy

The Alignment of Trust Services Criteria & the COSO Framework

COSO Framework

COSO & SOC 2
CC1: Control Environment
CC2: Communication & Information
CC3: Risk Assessment
CC4: Control Monitoring
CC5: Control Activities

A Guide to Complementary User Entity Controls (CUEC)

What and Where to Find Them
Other Names
Response & Management
Complementary Subservice Organization Controls

Evaluation of Audit Opinion on a SOC Report

Where to Find
Opinion Outcomes
Scope
Dates

Reviewing SOC Testing

Types
Procedures

Financial Review

Financial Review Overview- Karianne Nink

Public Companies

Types of Public Reports
Form 10-k
Annual Report
10-Q
Form 8-K
S-1
S-4

10-K Section Review

Overview & Organization
Business
Risk Factors
Legal Proceedings
Management Discussion & Analysis

In depth Review of Financial Statements

Balance Sheet
Leverage
Interest Coverage Ratio
Income Statement
Statement of Cash Flows

Private Company Financials

Considerations
Guidance
Alternative Options

Reputation Review

Why Manage
Better Business Bureau
Complaints & Enforcement Actions
Lawsuits & Litigation

Insurance and License Review

Considerations
Types
Policy Considerations
Insured Entities
Licensing

Policy & Procedures

Data Protection & Governance Policies

Information Security Program
Data Security Policy
Record Retention & Data Destruction Policy

Policies & Procedures of your Third Parties

Business Continuity
Hiring/HR
Compliance Management
Vendor Management
Change Management
Social Media
Navigating TPSP Testing Documents
Penetration testing results
Business continuity testing results
Disaster recovery testing results