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## **Technology Compliance**

Concerns related to Customer Privacy and Regulatory guidelines have increased the demand for a well defined Compliance Program. Information Technology oversight should be included in the Institution's Compliance Program. To meet this demand, we have developed industry-specific Daily, Quarterly, and Annual Operating Procedures. These Procedures provide a mechanism for Internal Control and Risk Management. This Program was developed for the Community Banking Industry by Silverback Consulting. The program was shaped through the guidance of The Federal Deposit Insurance Corporation (FDIC), Office of Thrift and Supervision (OTS), and The Federal Financial Institutions Examination Council (FFIEC). We have combined these Procedures with our Reporting Guidelines to establish the Silverback Technology Compliance Program.

We take a "Keep it Simple" approach to our Compliance Program. Great efforts are taken to keep our Audit Scopes, Assessment Reports, Policies and Procedures of reasonable size. Most audit items can be conducted in less than an hour. Most of our Policies, Procedures, and Programs are less than 25 pages. Together we can create a manageable, secure and well defined IT Department. Our business processes can be quickly integrated into your Information Technology Department. Our Program is flexible and offers several levels of participation.

## **Daily Operating Procedure**

The Daily Operating Procedures are to be completed by the Information Technology Department or a Third Party Outsource. Once completed, they are initialed and archived in digital format. Problems discovered are reported using Silverback's Help Desk or Incident Response Procedures. Daily procedures are designed to verify service availability, review and score security and control the risks related to data processing and Information Technology.

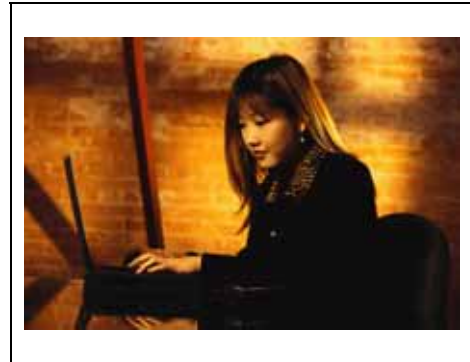
## **Quarterly and Annual Operating Procedure**

The Board of Directors ultimately owns Information Systems Security. However, The Board depends on data collected from various Departments and Third Party Reviews. The Board expects the Director of Information Technology to coordinate efforts and gather these reports. Silverback's Technology Compliance Program provides the Platform. We have developed a "Technology Compliance Worksheet" that will be used to coordinate all Program tasks.

## **Item Reporting**

Quarterly items are assigned "Task IDs" such as Q1, Q2, and Q3. Annual items are assigned "Task IDs" such as A1, A2, and A3. The IT Director is responsible for the scheduling and collection of each task. Once a task completed, it will be stored using or standard reporting template. Our report template will include the following information.

<input checked="" type="checkbox"/>	Task ID
<input checked="" type="checkbox"/>	Task Title
<input checked="" type="checkbox"/>	Date
<input checked="" type="checkbox"/>	Calendar Year
<input checked="" type="checkbox"/>	List Dual Control Participation
<input checked="" type="checkbox"/>	Obtain Dual Control Signatures
<input checked="" type="checkbox"/>	Provide Supplemental Audit Procedures
<input checked="" type="checkbox"/>	Audit Results and Report
<input checked="" type="checkbox"/>	Meeting Minutes
<input checked="" type="checkbox"/>	Recommended Action Items



Recommended action items will be reported through IT Steering Committee and the Board of Directors on a Quarterly Schedule.

## **Annual Report Guidelines**

The Technology Compliance Worksheet should be completed by the Director of Information Technology. Once a task completed, report collected, reviewed, and archived an item is considered complete. Significant findings should be reported immediately to the Board of Directors. An annual report is delivered to the Board at the end of each calendar year. The annual report will include the following:

<input checked="" type="checkbox"/>	The Completed Technology Compliance Worksheet
<input checked="" type="checkbox"/>	Audit Data (Working Paper)
<input checked="" type="checkbox"/>	Completed Task ID Reports
<input checked="" type="checkbox"/>	Budget and Risk Impact Analysis
<input checked="" type="checkbox"/>	IT Director's Report



## **Levels of Participation**

Silverback offers several ways for your Institution to participate.

### **Program Administrator**

We assume the role of coordinating all efforts. This includes coordinating IT Steering Committee, Audit Scope, and Policy Review. We create and maintain your Business Continuity, Disaster Recovery, Information Security, and Incident Response Plan. We work with your Internal or Third Party Audit Function. Reports are delivered to IT Steering Committee and the Board of Directors.

### **Program Support**

You receive Compliance Program usage authorization. We train your IT Staff and Internal Audit Function. We schedule a quarterly visit and assist with targeted items of concern.

### **Program Training**

You receive Compliance Program usage authorization. We train your IT Staff and Internal Audit Function. You receive sixty minutes of remote support each quarter. The support can be used to supplement your knowledge pool or review reports.

### **Program Maintenance**

You receive Compliance Program usage authorization. We assume a spot on your IT Steering Committee. Program updates will be delivered through the Steering Committee on a Quarterly Schedule.

### **Overall Offering**

- Silverback Fixes Broken Business Processes.
- Silverback Integrates Email, Web and Firewall Security Solutions.
- Silverback Aligns Policy with Compliance Effort.
- Silverback Resolves Audit and Examination Issues.
- Silverback Builds IT Departments.

### **Your Next Step**

Remove the burden of IT Administration. Get back to Business. Call the Silverback Consulting Group to schedule your initial Consultation.

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Information Technology Consulting / Staffing / Technology Compliance

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