

Concentration Risk

Examination Procedures and Implementations



On January 24, 2017 the office of the Comptroller of the Currency (OCC) published Bulletin 2017-7 with the subject, "Third Party Relationships," followed by the description, "Supplemental Examination Procedures."

OCC BULLETIN 2017-7

The Supplemental Procedures documents states,

"These procedures are designed to help examiners tailor the examinations of national banks and federal savings associations (collectively, banks) and determine the scope of the third-party risk management examination."

The specificity as to an expanded focus on concentration risk is found under the heading "Quantity of Risk" on page four of the document, beneath "Objective: To determine the quantity of operational risk associated with the use of third parties."

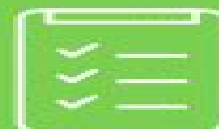
SUPPLEMENTAL
EXAMINATION PROCEDURES

CONCENTRATION RISK EXAM VALIDATION PROCESS

1

Determine whether there are any concentrations* among third-party relationships.

*Concentrations may arise when a bank relies on a single third party for multiple activities, particularly when several of the activities are critical to bank operations. Additionally, geographic concentrations can arise when a bank's loan portfolio, and that of its correspondent and subordinated banks, are located in the same region, or are dependent on the same critical power and telecommunications infrastructures.



2

Review the bank's methodology for identifying concentrations among third-party relationships

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RS Peters



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