

Examination Work Program
Business Continuity Planning (BCP)
As of XXXXXX

1) *Organizational structure*

Evaluate the effectiveness of the functional organization, reporting structure, staffing, primary duties, responsibilities and technical expertise, segregation of duties, cross-training, coordination with other departments, and changes in the foregoing since the last examination. Evaluate the enterprise wide methodology for BCP within the organizational structure and ensure the appropriate level of coordination within the examination team.

2) *Establishment of risk tolerances and development of key policies and oversight by the board of directors. Adequacy of senior management oversight and the risk management function.*

Assess risk tolerances, the development of key policies, and oversight by the board of directors. Evaluate the adequacy of senior management oversight and the risk management function for BCP activities, as applicable.

3) *Key FHLBank policies and procedures*

Identify and evaluate key FHLBank policies and procedures applicable to BCP activities.

4) *Risk assessment under Part 917 and internal control evaluation under SARBOX*

Evaluate the effectiveness of the annual risk assessment under Part 917 and of the internal control assessment under SARBOX applicable to BCP activities, as well as procedures implemented to periodically attest to the adequacy of the control environment.

5) *Testing performed by external audit, internal audit or consultants*

Evaluate testing performed by the FHLBank's external auditors, internal auditors or consultants of controls over its BCP activities.

6) *Information technology and controls*

Identify and assess the automated and manual systems and applicable controls utilized for processing transactions during recovery scenarios including authorized users, vendor technical support, and utilization of user developed applications. Coordinate with the IT examiner for disaster recovery capabilities (recovery of computer systems) to identify potential differences between the normal processing environment and recovery scenarios.

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7) *Identification and evaluation of controls and significant changes to the activity or function*

Evaluate the workflow and processes to be followed during recovery scenarios as well as controls, including the level and direction of risk and the quality of risk management. If applicable, conduct an assessment of any significant changes to BCP methodology that have been implemented since the last examination or are being considered that may affect the FHLBank's risk profile.

8) *Testing*

Conduct testing as appropriate. The scope of testing should be based on the preliminary review of governance, risk management, internal controls and audit coverage.

9) *Assessment of Risks*

Summarize the results of the activity or function examined in a separate memorandum. The memorandum must articulate the risks and the management of those risks. It should also clearly and specifically describe the basis and analysis for the assessment. The memorandum should discuss the type(s) of risk (market, credit, operational); the level of the risk (low, moderate, high); the direction of the risk (stable, decreasing, increasing); and the quality of risk management (strong, adequate, weak). A memorandum must be prepared irrespective of whether the examiner's assessment is positive or negative.

10) *Items requiring follow-up at the next on-site visitation*

Identify key issues that have been communicated to management (written or oral) that require follow-up during the next on-site visitation.