STRATEDGE WORKFLOW SYSTEMS, TARIK ZAHEDI

Proposal and Comment Information

Title: Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations, OP-1880

Comment ID: FR-2026-0030-01-C15

Subject

Docket No. OP-1880 — Comment of StratEdge Workflow Systems LLC

Submitter Information

Organization Name: StratEdge Workflow Systems

Organization Type: Company

Name: Tarik Zahedi

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October 13, 2026

Benjamin W. McDonough, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Re: Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations (Docket No. OP-1880; 91 FR 58438)

Dear Secretary McDonough:

Please find attached and below the comment letter of StratEdge Workflow Systems LLC on Docket No. OP-1880 (Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations, 91 FR 58438).

Respectfully submitted,

Tarik Zahedi
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Re: Proposed Third-Party Risk Management Guide for Traditional Community Banking Organizations (Docket No. OP-1880; 91 FR 58438)

Dear Secretary McDonough:

I am the founder and chief executive of StratEdge Workflow Systems, a founder-owned enterprise workflow and AI software company based in Newport Beach, California. StratEdge builds workflow-control and operational-governance software for financial operations, including StratEdge Workflow Control, RemitBot.ai (payment control for agent-to-agent transactions), GuardRoute.ai (pre-execution risk routing and action control), and ProofAudit.ai (decision and approval evidence). We also publish the quarterly StratEdge Bank Index (rebuilt from FDIC Call Report data across all 4,238 insured institutions) and the StratEdge Credit Union Index (computed from NCUA 5300 Call Report data across 4,299 credit unions).[1] Because we develop workflow and execution-control software for financial institutions, we disclose our commercial interest in how third-party technology governance is structured. None of our observations below require any specific vendor.

We write to share two empirical observations relevant to how community banking organizations evaluate, monitor, and govern third-party software and AI-assisted workflows under the Proposed Guide.

1. Scaling Due Diligence and Ongoing Monitoring to Community-Bank Operating Capacity

In our Q2 2026 StratEdge Bank Index analysis of FDIC Quarterly Banking Profile and Call Report data (released August 25, 2026), FDIC-insured institutions under $100 million in assets recorded an aggregate efficiency ratio of 76.47 percent, and institutions between $100 million and $1 billion recorded an aggregate efficiency ratio of 64.64 percent—compared with 53.74 percent at institutions above $250 billion in assets.[2] A similar pattern holds in our H1 2026 Credit Union Index, where institutions under $500 million in assets operate at a 78.62 to 80.23 percent efficiency ratio versus 65.88 percent above $1 billion.[3]

Community banks adopt third-party workflow and automation tools precisely to close this operating-cost gap. When third-party risk management (TPRM) expectations rely primarily on lengthy narrative questionnaires and periodic manual document reviews without distinguishing whether a third-party

tool can execute high-risk actions on its own, smaller institutions face a disproportionate administrative burden relative to the actual operational risk.

Recommendation. The final Guide could distinguish more explicitly between:

- **Third-party systems with autonomous execution or custody authority** (for example, systems that can initiate or release funds, alter core account records, or modify beneficiary data without a human or policy gate in the institution's control path); and
- **Advisory or bounded workflow systems** where execution remains gated by the institution's own role-based approvals, spending/action limits, and verifiable decision receipts.

Clarifying that due-diligence depth and monitoring cadence may be calibrated to *execution authority* —rather than treating all AI-enabled or cloud workflow tools as uniform high-complexity engagements —would allow community banks to focus scarce compliance staff hours on relationships where value or records can move without an internal gate.

2. Verifiable Pre-Execution Controls vs. Post-Hoc Log Review for AI-Assisted Third-Party Tools

As community banks evaluate third-party providers that incorporate large language models or automated agents into back-office intake, document review, dispute handling, or payment operations, traditional periodic vendor audits often check whether the vendor maintains general security policies rather than how individual operational actions are bounded at runtime.

In practice, three concrete technical controls give a community bank direct oversight of a third-party workflow or agent tool without requiring a large internal data-science team:

- **Separation of initiation and approval:** ensuring the third-party software or agent that recommends or drafts an action cannot self-approve a state change or release above policy thresholds;
- **Deterministic pre-execution routing:** enforcing explicit allow, hold, escalate, or block dispositions before an instruction reaches the core banking or payment rail; and
- **Immutable decision receipts:** retaining a tamper-evident record of what inputs were presented, which policy version applied, and which authorized officer approved any exception.

Including a brief checklist of these runtime control questions in the Guide's Contracting and Ongoing Monitoring sections would give community bank executives a practical, vendor-neutral way to supervise modern software providers.

Thank you for the opportunity to submit these comments.

Respectfully submitted,

Tarik Zahedi

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Notes

[1] StratEdge Workflow Systems, *The StratEdge Bank Index — Q2 2026 Operating Friction Benchmark* (Oct. 2026), https://www.stratedgeworkflow.com/bank-index; *The StratEdge Credit Union Index — H1 2026 Operating Friction Benchmark* (Oct. 2026), https://www.stratedgeworkflow.com/credit-union-index; technical specifications archived on Zenodo, DOI: 10.5281/zenodo.23175482.

[2] FDIC Quarterly Banking Profile, Second Quarter 2026, Table III-A (released Aug. 25, 2026); StratEdge Bank Index Q2 2026 dataset.

[3] NCUA 5300 Call Report Quarterly Data, cycle June 30, 2026 (released Sept. 14, 2026); StratEdge Credit Union Index H1 2026 dataset.