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Proposal and Comment Information

Title: Proposed Third-Party Risk Management Guidance, OP-1881

Comment ID: FR-2026-0031-01-C08

Submitter Information

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FORMAL PROPOSAL APPLICATION LETTER

MDS 8-7-10

FEDERAL ADVISORY COUNCIL × THIRD-PARTY RISK MANAGEMENT

OP-1881 — PROPOSED THIRD-PARTY RISK MANAGEMENT GUIDANCE

SOURCE • TELEMETRY • VERIFICATION • DISCREPANCY • NIR • AUDITABILITY

September 22, 2026

To: Board of Governors of the Federal Reserve System; Office of the Comptroller of the Currency;
Federal Deposit Insurance Corporation; National Credit Union Administration

Re: Formal Technical Proposal Application — OP-1881

Dear Members of the Board and Agency Review Staff:

I respectfully submit the MDS 8-7-10 Third-Party Risk Management Reconciliation Architecture for consideration in connection with OP-1881, Proposed Third-Party Risk Management Guidance.

MDS 8-7-10 is a conceptual, analytical, diagnostic, evidentiary, verification-gated, and non-executable framework designed to organize third-party relationship information while preserving separation among source information, representation, observation, administrative records, verification, evidence, and external authority.

The proposed architecture establishes the following reconciliation sequence:

SOURCE → REPRESENTATION → OBSERVATION → TELEMETRY → NORMALIZATION →
ANALYTICAL MODEL → MODEL OUTPUT → DISCREPANCY/DRIFT → CORROBORATION →
INDEPENDENT VERIFICATION → EVIDENCE → EXTERNAL REVIEW

A core state model is:

S_R = REPRESENTED

S_O = OBSERVED

S_A = ADMINISTRATIVELY RECORDED

S_V = INDEPENDENTLY VERIFIED

$S_R \neq S_O \neq S_A \neq S_V$

This separation is intended to prevent an administrative record or analytical output from automatically being treated as independently verified fact.

For third-party relationships involving technology, data, service providers, contractual interfaces, and operational dependencies, the architecture proposes documenting identity, scope, contractual parameters, system version, configuration, provenance, telemetry, materiality, discrepancy, drift, corroboration, verification status, escalation, remediation, and audit history.

Potential discrepancies include data-integrity failures, schema mismatches, transformation or unit errors, configuration drift, version mismatch, logging failures, missing provenance, conflicting records, and unavailable independent verification. A discrepancy is a review trigger, not an automatic finding of fraud, violation, liability, misconduct, or contractual breach.

The framework introduces NIR — NO-LONGER-INDEPENDENTLY-RESOLVABLE — as a controlled verification state for a material field, event, relationship, or proposition that cannot presently be independently resolved from available evidence. NIR preserves the last verifiable state, unresolved issue, source gap, conflicting evidence, required corroboration, external-review requirement, and resolution status.

NIR ≠ FRAUD ≠ VIOLATION ≠ LIABILITY ≠ INVALID INSTITUTION ≠ LACK OF AUTHORITY

The proposed Master Event Ledger would preserve EVENT_ID, TIMESTAMP, THIRD_PARTY_ID, SOURCE_ID, RELATIONSHIP_ID, VERSION, CONFIGURATION, STATE_IN/OUT, TELEMETRY, PARAMETERS, MODEL_OUTPUT, DISCREPANCY, DRIFT, CORROBORATION, VERIFICATION, NIR, EVIDENCE, EXTERNAL REVIEW, and AUDIT TIMESTAMP.

An Authority Firewall separates:

INTERNAL MODEL STATE

↓

AUTHORITY FIREWALL

↓

JURISDICTION → AUTHORITY → PROCEDURE → DUTY → AUTHORIZATION

The Federal Advisory Council is referenced solely as an external advisory-information channel. This proposal does not represent the FAC, any FAC member, the Federal Reserve Board, a Reserve Bank, or another governmental institution.

Accordingly:

ADVISORY INPUT ≠ VERIFIED FACT ≠ AUTHORIZED DECISION ≠ EXTERNAL ACTION

I respectfully request consideration of these concepts as potential governance, documentation, provenance, verification, discrepancy-management, and auditability controls within the development of final third-party risk-management guidance.

The proposal is intended to complement—not replace—existing governance, risk-management programs, contractual controls, applicable law, supervisory processes, examination procedures, or regulatory authority.

MASTER CONTROL:

MODEL OUTPUT ≠ VERIFIED FACT

VERIFIED FACT ≠ AUTHORIZED DECISION

AUTHORIZED DECISION ≠ EXTERNAL ACTION

Respectfully submitted,

Dr. Marcelas Deshawn Saulsberry

MDS 8-7-10

Proposed Technical Architecture / Independent Submitter

CLASSIFICATION: CONCEPTUAL • ANALYTICAL • DIAGNOSTIC • EVIDENTIARY •
VERIFICATION-GATED • NON-EXECUTABLE