



## GUIDANCE & SUPERVISION

# LISCC Program Office of the Operating Committee Operating Manual

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### ***Redacted Public Version***

***Note: All redactions in this redacted public version are indicated in bold, italic font with brackets around it, like this: [Redaction: description of redacted material]. Additionally, the front cover, end page, and some font sizes and colors are slightly different from the original internal document to reflect Board publishing standards and to increase accessibility.***



BOARD OF GOVERNORS OF THE FEDERAL RESERVE SYSTEM

OOO Operating Manual

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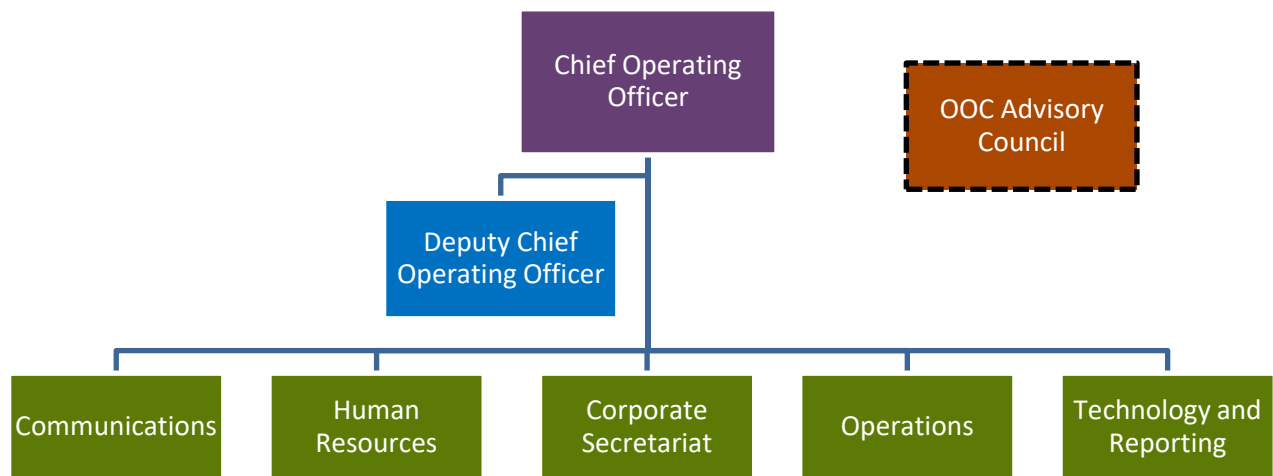
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# OOC Operating Manual

## Section I: Overview and Operations

The Office of the Operating Committee (OOC) provides infrastructure for and oversight of the operational and strategic functions of the Large Institutional Supervision Coordinating Committee (LISCC) Program and is headed by the Chief Operating Officer (COO), who is selected by and reports to the Operating Committee (OC) Chair.



## OOC Governance Structure

### Chief Operating Officer

The COO is responsible for establishing the day-to-day operational aspects of the LISCC Program and serves as the Chair of the OOC Advisory Council (OOCAC).<sup>1</sup> The COO is supported by a Deputy COO, who serves as the backup to and assists the COO in the execution of the OOC’s responsibilities, and multiple functional leads and their teams.

Day-to-day responsibility and accountability for following established operational aspects of the LISCC Program resides with the individual core programs (i.e., Capital, Liquidity, Governance and Controls, Recovery and Resolution, and Monitoring and Analysis; also sometimes referred to as portfolio programs) and the Dedicated Supervisory Teams (DSTs), and their respective Co-Chairs and operations teams.

The COO’s key responsibilities include:

- Oversee development of operational and support elements of the LISCC Program
- Serve as the OOCAC Chair, or delegate to designee

<sup>1</sup> The OOCAC was established in March 2022 and subsumed the respective authorities and responsibilities of the Governance Working Group (GWG) and the Workforce Planning Committee (WPC). See OOCAC section for additional information.

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- Serve as the direct functional manager (for the purposes of OOC responsibilities) of all LISCC Program members in the OOC organizational structure
- Support the OC in supervisory planning, prioritization, and rating (Annual Assessment, or AA) processes and decisions
- Serve as the backup to and assist the OC Chair in the execution of the OC's responsibilities
- Active OC participation as both member and COO

### OOC Advisory Council (OOCAC)

The legacy Governance Working Group (GWG) worked with the OC Chair to review the appointment of OC and core program steering committee (SC) members. Now, the OC Chair retains primary responsibility for considering OC member changes but may request OOCAC member feedback at their discretion. Responsibility for reviewing and endorsing SC member recommendation changes now lies with the OOCAC. Other former GWG responsibilities for appointing key LISCC Program personnel transitioned to the OOC Human Resources (HR) team when it was formed.

As stated in the OOCAC charter,<sup>2</sup> the OOCAC also provides input on overall strategic direction for the OOC and the LISCC Program, including advising on resource management and workforce planning initiatives. The charter is periodically reviewed and updated as needed. The Corporate Secretariat team supports the OOCAC and maintains its final records on the LISCC SharePoint site, located in the OC Workspace in the Governance Working Group section in the OOC Advisory Council folder. The Corporate Secretariat team partners with the OOC HR team to ensure conflicts of interest are reviewed prior to new SC or OC members being appointed as described in AD letter 23-5/CA Admin 23-6, *Conflicts of Interest Standards Applicable to the LISCC Supervisory Program*. See Meeting Summary Framework in Appendix C for additional information.

### Functional Leads

Based on the OOC's roles and responsibilities, five key functional areas were identified as part of a LISCC Program restructuring implemented in late 2018: Operations, Human Resources, Communications, Corporate Secretariat, Quality Control, and Technology and Reporting.

Functional leads, with their teams, are responsible for each of the five key functional areas depicted in the organizational chart. For each area, the functional lead is responsible for providing guidance, instruction, and direction to the team to ensure day-to-day operations are effectively and efficiently executed. The lead is also responsible for executing functional duties not delegated to team members. The next section describes the roles and responsibilities of each of those functions.

## Roles and Responsibilities

### OOC

- Leads and ensures the LISCC Program Operating Manual is up to date and relevant and aligned with Federal Reserve System (FRS, System, or Board) guidance and technology expectations (note that this operational document is separate from the publicly available LISCC Program Manual)
- Provides process guidance and support for the LISCC Program in the creation of the supervisory plan

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<sup>2</sup> The 2024 charter is linked as an example. The current version resides on the LISCC SharePoint site in the OC Workspace.

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- Provides process guidelines and support for the OC in the preparation of its annual integrated supervisory ratings vetting
- Collaborates and coordinates with the operations team for each core program and the DSTs
- Establishes processes necessary to ensure effective Program leadership succession planning
- Ensures all LISCC Program staff are receiving regular formal and informal performance feedback throughout the year
- Develops and maintains a process for understanding the resource footprint of the LISCC Program and resource needs of core programs and DSTs
- Ensures all programs are adequately staffed to execute the OC supervisory plan and working with the OC to address any gaps
- Creates and disseminates internal communications for the LISCC Program community so that all are informed about important LISCC Program developments, events, processes, outcomes and other pertinent information
- Ensures core programs are executed in a manner consistent with the LISCC Program Operating Manual
- Surfaces areas where Program guidance is absent, unclear, or in need of improvement and referring to relevant governing body
- Facilitates periodic business process improvement activities (longer term effort) to maximize the effectiveness of the LISCC Program, minimize risks, and find efficiencies

### Corporate Secretariat Function

- Strategically and proactively develop, issue, and maintain the forward-looking LISCC Program key meeting and deliverables calendar by:
  - Outlining key process tasks and establishing dates for the supervisory planning process and the Annual Assessment process, in collaboration with core program and DST operations teams
  - Maintaining key LISCC Program governance meetings, specifically for the following meetings: OC, LISCC (committee), OOC, OOCAC, Vice Chair of Supervision LISCC Program updates, and the Interagency Large Institution Management (ILIM) meeting
    - Proposing agenda topics in advance of upcoming meetings for the OC and LISCC Chairs' consideration
    - Expeditiously and accurately drafting and posting key meeting takeaways to the appropriate retention source per System guidance<sup>3</sup> for applicable meetings<sup>4</sup>
    - Coordinating with Board Supervision and Regulation (S&R) and other Board Divisions for purposes of advance planning and to regularly identify potential conflicts and resolve them
    - Onboarding new committee members, maintaining and tailoring materials as needed depending on an incoming individual's LISCC Program background and experience (e.g., some members may need only a short discussion about OC and/or LISCC meeting)

<sup>3</sup> AD letter 18-9, *The Management of Supervisory Documents and Data by Reserve Banks* and information classification requirements. Information handling information is found: (1) *The Federal Reserve Information Security Standard: Information Classification and Handling, Supervision and Regulation Information Security Classification Guidance*; (2) Division of Information Technology's *Information Classification and Handling Standard*; and (3) *Guidance for Information Classification of Supervision and Regulation (S&R) Documents*.

<sup>4</sup> AD letter 19-5, *Framework for Assessing Oversight of the LISCC Supervision Program*, requires meeting takeaways to be finalized within 30 days. To do reviews needed, staff will be instructed to produce takeaways significantly sooner at their manager discretion.

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participation and not require a separate onboarding)(see Senior Leadership Onboarding section)

- Maintaining the associated active directory (AD) LISCC Program groups and LISCC SharePoint lists as appropriate (specifically, LISCC, OC, and OOCAC members) (see Meeting & Calendar Management section)
- Contribute to, and in some cases lead, aspects of core LISCC Program processes, particularly the supervisory planning and AA processes (see Meeting & Calendar Management section)
- Lead the OC notational vote process for supervisory and non-supervisory actions in coordination with the Board LISCC Integration section and OOC HR team, respectively (see Notational Vote Process section)
- Support the Board S&R Operations Group Workforce and Workplace Management Board S&R Operations Group Workforce and Workplace Management function<sup>5</sup> and OOC HR with annual Board credentials process and, as needed, conflicts checks for proposed SC members, incoming OC and LISCC (committee) members, and LISCC (committee) delegates when notified in advance of their attendance.
- Coordinate with Board Divisions, including S&R (e.g., Office of the Secretary (OSEC), to assist with LISCC Program management, as needed.
- Support the Board LISCC's Senior Associate Director (SAD) and OC Chair's roles within the Board S&R Division, including, but not limited to: SAD calendar management, organizing internal Board S&R Supervision Group biweekly updates, assisting with third-party oversight (e.g., LISCC Oversight, Office of the Inspector General (OIG)) responses, engaging with Board LISCC Integration regarding foreign regulator engagement, drafting Board member briefing memos, and other ad-hoc assignments.

### Operations Function

- Ensure LISCC Program manual is relevant and up to date
- Maintain the LISCC operating manuals
  - Coordinate with the operational leads for each LISCC core program (Capital, Liquidity, Governance and Controls (G&C), Monitoring and Analysis Program (MAP) and Recovery and Resolution Planning (RRP)
- Manage LISCC Conflicts of Interest and Examiner Commissioning Program (ECP) processes
- Manage Onboarding/Offboarding into Program
- In collaboration with the Technology and Reporting Lead, facilitate periodic business process improvement activities to maximize the effectiveness of the Program, minimize risk and find efficiencies

### Technology and Reporting Function

- Develop and maintain a technology strategy and roadmap incorporating the needs of each core business
  - Working closely with LISCC business leaders
- Develop and maintain quality metrics that inform leadership if the Program is operating according to expectations, this includes business and HR metrics
- In collaboration with the Operations Lead, facilitate periodic business process improvement activities to maximize the effectiveness of the Program, minimize risk and find efficiencies
- Manage AD groups, partnering with Corporate Secretary

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<sup>5</sup> Contact the following email address for information: **[Redacted: email address]**.

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### HR Business Partner Function

- Liaise with HR specialists and others involved to develop all necessary processes to staff the LISCC Program and to ensure succession planning for the leadership of the LISCC Program
- Ensure people spending most of their time on LISCC supervision work are receiving regular formal and informal feedback throughout the year
  - Includes development of clear expectations
  - includes regular one on one meeting cadences
- Develop and maintain process(es) for understanding the resource footprint of the LISCC Program and resources needs of core programs
- Identify training needs (work with core program SCs and OC), and prepare and execute strategies for filling them
- Recruit for national positions

### Communications

- Develop, maintain, and update a communications strategy that can help the OC and SCs identify what needs to be communicated, by whom, and through which channel
- Support the Corporate Secretariat in the production of timely internal communications for the LISCC Program community so that all are informed about important LISCC Program developments, events, processes, outcomes and other pertinent information
- Ensure the communications strategy is aligned with the goals of the Program and helps to support and reinforce the goals of the Program
- Advise on any internal communication related to the day-to-day running of the Program
- Produce talking points to be used by OC members and other LISCC Program members to communicate key information, and to do so in a way that contributes to and helps to build the national LISCC Program/One Team concept
- Support the divergent views efforts that take place in the individual core programs and DSTs and provide a programmatic approach, mechanisms, and regular assessments to determine how the OC is meeting its obligations in this area

### Divergent Views

The LISCC Program has a policy for divergent views. LISCC expectations surrounding divergent views are available [here](#).

## Section II: Communication Framework

Content to be developed in 2025.

## Section III: Corporate Secretariat Function

While this section includes additional information regarding some of the Corporate Secretariat (CS) team's key responsibilities and processes, it is not intended to be all-inclusive as to daily responsibilities, tasks, and execution.

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### Meeting and Calendar Management

The CS team, as noted above, is responsible for scheduling and coordinating key LISCC Program governance meetings, specifically the OC, LISCC (committee), OOCAC, Vice Chair of Supervision LISCC Program updates, and the ILIM. The CS team is also responsible for scheduling OOC-related meetings, such as the OOC Team meetings and Operations Community calls. Depending on the meeting, the CS team collaborates with the appropriate Chair (or interim Chair) on agendas. The CS team also engages with presenters to obtain materials, etc. All meetings are managed via the Board shared mailbox and calendar: **[Redacted: email address]**. The CS team has developed the Meeting Summary Framework in the Appendix to outline expectations for the various meetings.

#### LISCC Program Calendar

The CS team is responsible for starting the Program's key meetings and deliverables calendar, in addition to meetings in the Meeting Summary Framework, the team includes key meetings and deliverables for the supervisory planning<sup>6</sup> and at least annual ratings assessment (AA) processes. The team typically begins the process in August, which often continues into October given the need to collaborate with core program and DST operations teams, other portfolios (e.g., LFBO), other Board Divisions (e.g., for SRIF, Governor offices), and Reserve Bank functions (e.g., FMU-SC). Programs and DST operations team are responsible for their own steering committee (SC) and program-specific meetings. All groups, including the CS team, are responsible for updating and maintaining the LISCC SharePoint LISCC Roll-up Calendar.

**LISCC Roll-up Calendar Expectations:** The calendar's purpose is to provide transparency of broader LISCC Supervisory Program meetings to assist others in scheduling meetings to ensure leadership and or core programs/DSTs are widely available. The LISCC Supervisory Program DST and core program operations teams and members of the OOC are responsible for adding key meetings, such as OC and SC meetings, to the LISCC roll-up calendar. Core program and DST operations teams must also include program-wide and periodic in-person meetings (e.g., "MAP In-person FRB-BOS"). The CS team is responsible for including OC, Vice Chair of Supervision, LISCC (committee), LISCC Program Town Hall, LISCC Program Education Expo, OOC Advisory Council (OOCAC), and Interagency Large Institution Management (ILM) meetings on the calendar. The Board LISCC Integration team is responsible for meetings with foreign banking regulators (e.g., Trilaterals). There is no expectation that individual firm meetings are included on the LISCC roll-up calendar. Tactical instructions on updating the calendar are located here. Responsible parties are those individuals on the LISCC Program organizational charts.

#### Senior Leadership Onboarding

The CS team is responsible for onboarding new LISCC and OC Chairs and members and supporting onboarding of new OOC chief and deputy officers and other senior leadership positions as requested. The team provides a flexible, efficient and customizable approach depending on the incoming members' background and experiences. Senior Leadership (OC, LISCC) onboarding materials are maintained on the LISCC SharePoint site under SLOP Project Working Library - All Documents (frb.gov). Core documents are:

LISCC Senior Leadership Onboarding Program  
 LISCC Governance Structure and Operating Model Overview  
 LISCC SharePoint Navigation

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<sup>6</sup> This includes the supervisory plan "midyear refresh" and timing for risk identification and supervisory priorities, referred to as the areas of focus.

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### LISCC Conflicts of Interest and Post-Employment Reviews

An example of tasks the CS team would complete to onboard a new OC member would include, but not be limited to:

Responsible Team Member	Date Completed	Task
		Draft welcome email
		Send welcome email
		Add to meeting invites
		Submit SR-NAMS requests for the following email/AD groups: <ul style="list-style-type: none"> <li>SYS SR LISCC Operating Committee <i>[Redacted: email address]</i></li> <li>SYS SR LISCC OC COCHAIRS <i>[Redacted: email address]</i></li> </ul> Obtain and include name of administrative assistant and back-up (LISCC members only) in the following email/AD groups: <ul style="list-style-type: none"> <li>SYS SR LISCC OC Admin Support <i>[Redacted: email address]</i></li> <li>SYS SR LISCC Admin Support <i>[Redacted: email address]</i></li> </ul>
		Add to the LISCC SharePoint site: <ul style="list-style-type: none"> <li>OC Members</li> <li>LISCC Members</li> </ul>
		Confirm with DST operations contact to add member to the DST page on LISCC SharePoint site

An example of the content typically sent from the *[Redacted: email address]* is as follows:

<p><b>Subject:</b> Welcome to the LISCC OC!</p> <p>Hello, NAME - Welcome [back] to LISCC and to the LISCC Operating Committee (OC)!</p> <p>As part of your new role on the OC, the Office of the OC's (OOC) Corporate Secretariat (CS) team will begin sending you a series of meeting invitations from the OperatingCommitteeCOO mailbox for the following meetings:</p> <ul style="list-style-type: none"> <li><b>OC Co-Chair Calls</b> - one-hour calls held on the 2<sup>nd</sup> and 4<sup>th</sup> Tuesday of the month from 1:00 to 2:00 p.m. ET to discuss pertinent issues affecting the programs or firms, receive updates from subcommittees and/or policy/procedural changes. While these meetings are typically optional for non-OC Co-Chair members, there are times when all OC member attendance is required (e.g., interim ratings discussions; Program governance matters). Most OC members do try to attend.</li> <li><b>Bilateral Call with DST Co-Chairs</b> - 45-minute calls typically held on the 1st and 3rd Tuesday of the month from 3:00 to 3:45 p.m. ET to discuss pertinent issues affecting the firms or dedicated supervisory teams (DSTs).</li> <li><b>“Quarterly” OC Meetings</b> - 2-day meetings that are held typically four times a year and in-person at a LISCC Reserve Bank or at the Board with option to participate remotely. These meetings include topics such annual or interim supervisory rating assessment vettings, supervisory planning, program/firm updates, or Board Policy or System updates.</li> <li><b>LISCC Briefings with Vice Chair Barr</b> - 50-minute monthly calls to brief the Vice Chair on LISCC portfolio topics or issues as needed. Invitees for these calls are subject to change based on the agenda topics which are confirmed closer to the meeting date.</li> </ul>
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- **Interagency Large Institution Management (ILIM) Meetings** - LISCC and LFBO interagency meetings with Large Bank Supervision counterparts at the DC Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC) to foster communication and collaboration. These remote meetings are held quarterly on the 2nd Monday of the last month of the quarter from 9:00 am to 12:00 pm, except for June which is typically a 1-hour meeting.

As a reminder in your role as [DST Co-Chair and OC member], you will need to recuse yourself from any discussions related to the firm in which you currently have a conflict of interest. Feel free to reach out to **[Redacted: email address]** if you have any questions.

We are happy to schedule time to answer any questions you may have about your role as an OC member. Please let us know if you would like a meeting scheduled, we can include the OC Chair as needed. [Ex. Given your time in LISCC as the DST Lead for FIRM and on the LISCC Capital and MAP Steering Committees (SCs)], we know you are familiar with many aspects of the LISCC Program. In the attached document, refer to slides 13 through 15 and slide 17 for a few groups and meetings that you may have been unaware of in your SC membership role. In the meantime, the CS team has requested your access to the LISCC OC SharePoint site where materials are posted for the OC meetings, and please let us know the name of your administrative assistant, if any, in order that we may grant them access to the SharePoint site and include them on the appropriate meeting invitations.

We look forward to your active and engaged membership on the OC!

Please feel free to reach out directly to **[Redacted: names and email addresses]** and again, welcome to the OC.

Likewise, some of the above steps are followed for offboarding members (thank you email typically sent by the OC Chair).

### Senior Leadership Access Management

As with meetings, the CS team is responsible for updating the LISCC SharePoint site lists and organizational chart (as appropriate) for the LISCC and OC. This includes making sure that incoming members have the appropriate Terms of Use Agreement (TOU) and Confidential Supervisory Information Eligibility Status for LISCC, OC, and OOCAC members when adding them to the appropriate active directory (AD) groups.

- *TOU and CSI Checks:* Supervision & Regulation National Access Management System (SR-NAMS)
- *Note:* Look-ups are done in the system, no additional records are maintained.
- **[Redacted: hyperlink to internal website at which security access is managed]**

In support of the OOC T&R team, the CS team sends quarterly reminders to core program and DST operations teams to update their AD groups, organizational charts, and program pages on the LISCC SharePoint site. Reminders are typically sent around quarter end, with updates typically due within 10 days so that information is available by quarter end. An example of the content typically sent from the **[Redacted: email address]** is as follows:

<b>Subject:</b> Action Required: Membership and Contact Information Updates
Program and DST Operations Leads and Coordinators,

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- It is time to review and update your LISCC Program membership and contact lists. Please review the current membership of your steering committees (SC) and dedicated supervisory teams (DSTs), content, and the organizational charts on the LISCC SharePoint site by WEEKDAY, MONTH DATE, YEAR. Additionally, submit change requests for your primary email/active directory (AD) groups by the same date. You can look up your AD groups by using: **[Redacted: hyperlink to internal website at which AD groups can be searched]**. If you have trouble using the group lookup site, contact the **[Redacted: email address]**, as a Board staff member may need to assist you.

As noted on the LISCC SharePoint Access page, operations teams and coordinators are responsible for using the LISCC National Access Management Tool for access addition, change and removal requests.

As a reminder, the information is a source for:

- the LISCC Quarterly Executive Management Report
- OOCAC discussions on proposed SC membership changes
- the LISCC Roster and service level engagement (SLE) analysis
- the OC, LISCC, SRIF, and SC member lists on the “About” LISCC SharePoint site page for each committee, core program, and DST

If you have any questions, please contact **[Redacted: email address]**. Thank you in advance for your assistance.

### Interagency Coordination – Domestic

As noted above, the CS team supports the ILIM meetings on behalf of both the Board LISCC and LFBO portfolios. See Appendix C Meeting Summary Framework for additional information on the various associated meetings. The CS team serves as the Federal Reserve ILIM coordination representative and liaises with the coordinators at the other agencies, including the Office of the Comptroller of the Currency (OCC) and the Federal Deposit Insurance Corporation (FDIC).

In addition to coordinating the meetings, the CS team facilitates certain information sharing, such as the sharing of organizational charts and supervisory plans between the agency D.C. offices. For example, annually, the OCC provides its supervisory strategies for LISCC firms national banks to the CS team. While the DSTs get more detailed and current information on OCC DST supervisory plans and schedules, the strategies are informative to various stakeholders in the Program and the Board. As such, the CS team will post the strategies to the LISCC SharePoint site and notify the core program and DST operations teams so they can notify or distribute the plans as they deem appropriate.

The strategies are posted on the LISCC SharePoint site → Workspaces → Dedicated Supervisory Teams → Supervisory Planning → by Firm & Year (e.g., 2024).

### Supervisory Ratings Process – Interim and Annual Assessment Support

In addition to supporting the process through the LISCC calendar and completing OC AA meeting notes, the CS team also provides support to other tasks, for example: 1) reviewing, seeking feedback, and finalizing the AA supervisory letter annually; 2) reviewing, seeking feedback, and finalizing the AA OC presentation decks; 3) supporting the AA Tactical Information Package (TIP) and 4) sending OC Chair rating decisions via email to the DSTs, and posting the emails to the appropriate workpapers (e.g., in OASIS).

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### Supervisory Planning Process Support

In addition to supporting the process through the LISCC calendar, the CS team also provides support to other tasks, for example: reviewing, seeking feedback, and facilitating the supervisory priorities or areas of focus process in coordination with the Monitoring and Analysis Program (MAP) leadership, the OC Chair, the OOCAC, and other members of the OOC. If the OC Chair does not endorse/approve the supervisory plan changes during an OC meeting, the CS team will have the Chair send an email to the OperatingCommitteeCOO mailbox with the decision and distribute to applicable stakeholders as needed.

### Ad-Hoc Support

The CS team provides ad-hoc support for both the LISCC Program and for the Board LISCC section. The CS team provides calendar management support to the OC Chair, which requires substantial time by at least one team member. For the Board LISCC section, examples of support include providing Deputy Director OOC biweekly updates, providing confirmation of section members for the Board S&R Operations Group Workforce and Workplace Management (WWM) to facilitate the annual credentials process, supporting the Board S&R Operations Group Records personnel with LISCC-related AD 18-9 records manual updates, engaging with Board LISCC Integration for other regulatory presentations and Governor briefing memos, and providing LISCC contacts to support the Financial Market Utility (FMU) Steering Committee (SC) annual Crisis Communication Framework LISCC contacts updates.

### Notational Vote Process<sup>7</sup>

#### *Background and Purpose:*

The OC Chair may, on occasion, request input from OC members via e-mail for, but not limited to, supervisory actions such as enforcement action (EA) changes/closures, supervisory ratings changes, and for non-supervisory actions, so long as the request is straightforward and non-controversial. While the endorsement for supervisory actions is the responsibility of the entire OC, the approval of non-supervisory actions, such as administrative or other matters which are ad-hoc in nature may be delegated to the individual SC program Co-Chairs, the OOCAC, or the OOC. In most cases, the endorsement (commonly referred to as “notational votes”) by the OC members does not warrant additional follow-up. However, in cases where there is not a quorum or dissent in endorsing the action requested, additional follow-ups, including meetings, are conducted. The OC Chair determines whether an action may be distributed for input via email or if the matter should be presented to the OC at a meeting (scheduled or ad-hoc). For supervisory actions related to EAs, the request is coordinated by the Board S&R LISCC Integration team.

The CS team will liaise between a requestor and the OC Chair, program Co-Chairs, and members-at-large, as appropriate, to ensure that supporting documentation for the endorsement related to its responsible portions of the process is retained in the appropriate system of record. Generally, there are two types of endorsement:

- 1) **Supervisory Actions**, such as EA changes/closures, ratings changes, and other supervisory actions, that are straightforward and non-controversial, are reviewed and endorsed by the OC members. For state member bank dividend requests in excess of Regulation H requirements, DSTs are to provide a summary analysis and recommendation concurrently to the DST and Capital program Co-Chairs for their review and endorsement to the OC Chair for their approval.

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<sup>7</sup> For legacy Notational Vote Procedures refer to the following archived links: Archived 2021 Notational Vote Procedures

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- 2) **Non-Supervisory Actions**, such as administrative or other matters which are ad-hoc in nature, are reviewed and approved by program Co-Chairs or a committee such as the OOCAC for program steering committee (SC) membership. In some cases, the OC Chair, COO, or Deputy COO may be the decision maker outside of this process.

### Supervisory Actions - How to Request an OC Notational Vote:

A core program or DST Co-Chair, Board LISCC Integration, or a DST Lead should communicate with the OC Chair to determine whether the action being requested requires OC or Co-Chair approval via an OC meeting or via the notational vote process. If the OC Chair determines that the notational vote process is appropriate for the action, the requestor should contact the CS team via the OperatingCommitteeCOO mailbox at [Redacted: email address] to initiate the notational vote request to the OC, program Co-Chairs, or OOCAC. The requestor must provide the following information:

- **Requestor Information** – include the name/program/team submitting the request (i.e., LISCC Program Co-Chairs or operations team, a DST, or the Board S&R LISCC Integration section).
- **OC Chair Approval** – copy of email or statement indicating that the OC Chair has approved the action for distribution via notational vote.
- **Action Requested** - this section should indicate the action being requested and shall also include two sentences to endorse the action and state that the issues are straightforward. For example:
  - The (insert team/program name) SC supports the recommendation to (insert action being requested).
  - The (insert program name) Co-Chairs believe the issues are straightforward and as such this is being presented to the OC members or program Co-Chairs as a notational vote.
- **Background Information** – Include reference to the support provided for the request.
- **Supporting documentation** – Attach documents or, when available, link to the appropriate information (e.g., EA matrix) in the common examination platform.
  - *For supervisory actions such as EA changes/closures, ratings changes, please include:*
    - EA matrix: this is a required document for proposed EAs
    - Additional supporting documentation as provided; examples may include:
      - Memo from DST and/or core program
      - Letters to the firm
      - Conclusion memo
      - OC meeting notes
      - Other documents including those related to divergent views

### Supervisory Actions Notational Vote Next Steps:

At direction of the OC Chair or delegate, upon receipt of all the required information, the CS team will initiate a formal notational vote request to the OC or program Co-Chairs. Below is an estimated timeline, which takes approximately ten (10) days, for the next steps in the process. As needed, requestors can request an expedited response.

Task to be Completed	Estimated Timeline (≈ 10 days)
Upon receipt of a notational vote request, CS team will prepare an email request to the OC or program Co-Chairs	1 day
OC or program Co-Chairs review and submit votes to LSCG	6 days

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CS team tracks vote and submits a “notational vote control sheet” and sends to OC Chair for review and approval	1 day from voting close
CS team distributes notational vote decision to appropriate parties	1 day
OC Chair review and decide; if an EA, OC Chair will contact Board Legal directly regarding approval	1 day
<b>Notes:</b> <ul style="list-style-type: none"> <li>▪ Unless known in advance, requests coming in after 4 p.m. ET on Fridays or over weekend will be sent the first business day. The CS team may also need to send reminders if voting appears slow.</li> <li>▪ Quorum is 75 percent of current OC members, excluding the OC Chair.</li> <li>▪ For purposes of the tallying the vote, members not voting will be considered a non-objection and program Co-Chairs bringing forth the recommendation will be as approving/endorsing.</li> <li>▪ The CS team will include the correspondence and meeting notes in the common exam platform event designated by the Board S&amp;R LISCC Integration team in a <b>sensitive</b> folder entitled like “OC – Enforcement Action Recommendation”.</li> <li>▪ Action requested will typically include the following three options: <ul style="list-style-type: none"> <li>• <b>Approval/Endorsement – With or Without Comments</b> – Typically means most of the votes are in favor of the action without any need for follow-up.</li> <li>• <b>Disapproval/Do Not Endorse</b> – If most of the votes are not in favor, the CS team will notify the requester/applicable parties and ask that they consider next steps with the OC Chair.</li> <li>• <b>Meeting Requested</b> – If a meeting is requested, the CS team will notify the OC Chair. Initially, the OC Chair, or their designee, may reach out to the individual(s) requesting the meeting to see if their outstanding issues can be resolved. The OC Chair may determine that a meeting is needed to address the individual(s) concerns. If a meeting is deemed necessary,</li> </ul> </li> </ul>	

### Supervisory Actions - Sample Notational Vote E-mail to OC Members Requesting Review

An example of the content typically sent from the **[Redacted: email address]** is as follows:

<b>To:</b> SYS SR LISCC Operating Committee <b>[Redacted: email address]</b> Or, for example, SYS SR LISCC OC Co-Chairs <b>[Redacted: email address]</b>
<b>CC:</b> LISCC CS Team Responsible for Notational Votes; Board S&R LISCC Integration manager and staff member responsible for notation votes; applicable DST members
<b>Subject:</b> Action Required by INSERT WEEKDAY, MONTH DAY, YEAR: Notational Vote: Insert firm and topic (e.g., FIRM Proposed Enforcement Action)
<p>The FIRM (FIRM ABBREVIATION) dedicated supervisory team (DST) and the INSERT NAME program Co-Chairs, in consultation with the Board S&amp;R LISCC Integration (Board Integration) section, recommend an Enforcement Action (EA) in the form of a Memorandum of Understanding (MOU) between the Board and FIRM ABBREVIATION. The primary subject matter of the proposed MOU is for FIRM ABBREVIATION to address [significant liquidity risk management weaknesses that contributed to an interim downgrade of the firm's LFI Liquidity rating to Deficient-1 (D-1)]. For background, review the drafted FIRM ABBREVIATION proposed EA matrix (INSERT LINK PROVIDED FROM REQUEST).</p> <p>Given the proposed MOU escalates existing Matter Requiring Immediate Attention (MRIAs) and Matter Requiring Attention (MRA) that drove the less-than-well managed LFI [Liquidity] rating, the INSERT PROGRAM NAME Co-Chairs and Board Integration believe the matter is straightforward. Of note when reviewing the matrix, the proposed...</p> <p>The OC Chair, through communication with Board Integration, approved the EA recommendation to be distributed to OC members as a notational vote (as outlined in this section) [given the OC discussed the</p>

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issues driving the significant liquidity risk management ratings during its MONTH DAY, YEAR meeting (Link: OASIS meeting notes, access limited; also attached)...

### Action Requested

Please respond to the Operating Committee mailbox by Wednesday, MONTH DAY, YEAR indicating the following regarding the proposed FIRM ABBREVIATION [MOU] Matrix (in OASIS):

- Approval/Endorsement – note with or without comments and provide comments, if applicable
- Disapproval/Do Not Endorse
- Meeting Requested

For access issues, please contact Board Integration's NAME. For general questions about the proposed MOU matrix, please contact one of the following Board Integration staff: INSERT NAMES.

Thank you.

### Supervisory Actions - Sample Notational Vote Control Sheet

An example of control sheet and content is as follows, the control sheet must be used to track and summarize votes: *[Redacted: hyperlink to internal website to which the template of the control sheet is posted]*

### Supervisory Actions - Sample Notational Vote Email to OC Chair with Outcomes

An example of the content typically sent from the *[Redacted: email address]* is as follows:

**Subject:** For Your Review by MONTH DAY, YEAR: Action Required by MONTH DAY, YEAR: Notational Vote – FIRM ABBREVIATION [Enforcement Action] *(forward original email with the notational vote request)*

Dear OC Chair,

The notational vote control sheet [INSERT LINK TO DOCUMENT IN COMMON EXAM PLATFORM] for the FIRM ABBREVIATION [insert action name] is ready for review by WEEKDAY MONTH DAY, YEAR. Please reply to this email with your decision and any additional instructions. We will notify the appropriate parties of your decision and place this correspondence in the appropriate system of record.

Thank you.

### Supervisory Actions – System of Record

As noted above, the CS team is responsible for ensuring that the appropriate documents are retained in the appropriate system of record<sup>8</sup>. Records will be stored in the common examination platform (OASIS) in a sensitive folder as designated by the Board S&R Integration team or its Enforcement Actions Manual. Refer to the table in the preceding “**Supervisory Actions Notational Vote Next Steps**” section for additional information.

### Non-Supervisory Actions

The most common Non-Supervisory Action notational vote is for SC memberships. While program Co-Chairs often mention forthcoming nominations to the OC Chair, as noted above in the OOCAC section, it is responsible for reviewing and endorsing (or not) SC membership changes prior to OC Chair review.

<sup>8</sup> Prior to October 2024, certain records (not all the email correspondence) were retained in the LISCC SharePoint site Notational Vote library. Emails can be found in the Board S&R OperatingCommitteeCOO shared mailbox.

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Requestors contact the CS team, preferably via the OperatingCommitteeCOO mailbox **[Redacted: email address]** to initiate the notational vote request to OCCAC members. Requestors provide information on outgoing member and proposed incoming member and the individual's background in support of the nomination.

### Non-Supervisory Action - Next Steps

After receipt of the nomination request, below are estimated timeline and steps the CS team undertakes to solicit the OCCAC member feedback. As needed, requestors can request an expedited response.

Step or Task to be Completed	Estimated Timeline (≈ 15 days)
SC Nomination Receipt	N/A
CS team contacts OOC HR via <b>[Redacted: email address]</b> to complete conflicts check	3 to 5 days (Note: May take longer for Non-Board S&R Division nominations)
Once OOC HR conflicts check, CS team completes the Change Request form (below) and sends email to OCCAC members	1 day
Due date for OCCAC responses	7 days / one week from distribution
If there is a quorum of support for the nomination, CS team emails the OC Chair for final approval	1 day from feedback/vote close
OC Chair approval	≈ 3 to 5 days
CS team notifies the appropriate program Co-Chairs and Operations Leads of OC Chair approval	1 day
CS team posts all materials to the system of the record	≈ 1 day
<b>Notes:</b> <ul style="list-style-type: none"> <li>Unless known in advance, requests coming in after 4 p.m. ET on Fridays or over weekend will be sent the first business day. The CS team may also need to send reminders if voting appears slow.</li> <li>Given the low number of OCCAC members, quorum is ≈55 percent of current OC members, excluding the OC Chair.</li> <li>Action requested will typically include the following three options: <ul style="list-style-type: none"> <li><b>Support</b> – Typically means most of the votes are in favor of the action without any need for follow-up.</li> <li><b>Do Not Support</b> – If most of the votes are not in favor, the CS team will notify the requester/applicable parties and ask that they consider next steps with the OC Chair.</li> <li><b>Meeting Requested</b> – If a meeting is requested, the CS team will notify the COO or Deputy COO. Initially, the COO or Deputy COO, or their designee, may reach out to the individual(s) requesting the meeting to see if their outstanding issues can be resolved. The COO or Deputy COO may determine that a meeting is needed to address the individual(s) concerns. If a meeting is deemed necessary, the CS team will schedule it.</li> </ul> </li> </ul>	

### Non-Supervisory Actions – SC Membership Change Requests

The CS team will create the following document to provide in an email to OCCAC members. The OCCAC member notational vote will not be sent until after OOC HR notifies the CS team that the conflict review is complete. Any materials reviewed as part of the conflicts check is the responsibility of the OOC HR team. The CS team only retains an email with the request and response that the conflict check is complete.

**[Redacted: hyperlink to internal website to which the document template is posted]**

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### Non-Supervisory Action – Sample Email to OOC HR for a Conflict Check

An example of the content that may be sent from the *[Redacted: email address]* is as follows:

<b>To:</b> <i>[Redacted: email address]</i>
<b>Subject:</b> Proposed INSERT PROGRAM SC Membership – Conflict Check Request ( <i>forward original email with the membership request</i> )
OOC HR Manager Name and team,
See below regarding a nomination to add a new member to the INSERT PROGRAM steering committee (SC). The individual is at/in the RESERVE BANK INSERT function. Can you please let us know if there are any conflicts to be aware of before we send the nomination to OOCAC members? If it will take additional time, just let us know.
Thank you.

### Non-Supervisory Action – Sample Email to OOCAC for SC Membership Notational Vote

An example of the content that may be sent from the *[Redacted: email address]* is as follows:

<b>To:</b> Insert OOCAC member names
<b>Subject:</b> Action Requested by MONTH DAY, YEAR – INSERT PROGRAM NAME SC Nomination
OOCAC Members,
As stated in the OOC Advisory Council (OOCAC) charter ( <i>add link to current charter</i> ), one of the OOCAC responsibilities is to consult on proposed program Steering Committee (SC) structure and membership changes, including formulating recommendations for the OC Chair taking into consideration current membership diversity, tenor, and succession planning. Additionally, early in 2023, the SC Membership Principles (not requirements) were endorsed by the OC Co-Chairs and OC Chair in the Appendix of the LISCC Program Operating Manual (p.89).
<b>ACTION REQUESTED:</b> We have received an SC membership proposal for the <b>INSERT PROGRAM NAME program SC</b> and it is available here for your review ( <i>add link to Change Request form</i> ). Please respond to this email by <b>WEEKDAY, MONTH DAY, YEAR</b> indicating whether you support, do not support, or wish to convene a meeting to discuss the nomination in advance of recommendation to the OC Chair for final decisioning.
Thank you.

The CS team tracks responses and steps/tasks in a shared OneNote before moving certain records into the appropriate folder on the LISCC SharePoint site. See information below on the system of record. Below is an example of how the CS team tracks responses in the OneNote.

[Program] SC: PROPOSED MEMBER NAME (LINK TO CHANGE REQUEST FORM) (FRB-INSERT RB)				
OOCAC Member	Date received	Supports	Does Not Support	Requests a Meeting

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### Non-Supervisory Action – Sample Email to OC Chair Regarding SC Membership Notational Vote

Below is a sample email to the OC Chair and COO requesting approval of the SC Membership change request document, including results of the OOCAC member notational vote **[Redacted: email address]**:

<b>Subject:</b> Action Requested: OC Chair Approval: INSERT PROGRAM NAME SC Nomination
OC Chair Name,
A quorum of OOCAC members have endorsed the following SC membership proposal and OOC HR completed the conflicts check:
<ul style="list-style-type: none"> <li>INSERT PROGRAM NAME SC: ADD NAME AND INSERT LINK TO CHANGE REQUEST DOCUMENT</li> </ul>
<b>ACTION REQUESTED:</b> Please review the proposal above and advise us of your final decision.
Thank you.

### Non-Supervisory Action – Sample Email Notification to Applicable Program Nominees

Below is a sample email of content to the program Co-Chairs notifying them of the OC Chair's decision from the **[Redacted: email address]**:

<b>To:</b> INSERT NOMINATING PROGRAM CO-CHAIRS; INSERT NOMINATING PROGRAM OPERATIONS LEAD
<b>Subject:</b> Action Required – OC Chair Approval of the PROGRAM SC Membership Nomination
The OC Chair has approved the attached PROGRAM SC nomination ( <i>attach change request document</i> ).
<b>ACTION REQUESTED:</b> Program Operations Leads are to onboard SC member as appropriate, including:
<ul style="list-style-type: none"> <li>Updating program SC members list on the LISCC SharePoint site via the LISCC Committee and Program Contact Information page. This update will be reflected on the Committee Members report on the LISCC Roster Dashboard in Tableau and the LISCC Executive Management Report for the next quarter.</li> <li>Submitting appropriate SR NAMS Access request to add SC member to program distribution lists.</li> </ul>
Thank you.

### Non-Supervisory Actions – Systems of Record

As noted above, the CS team is responsible for ensuring that certain documents are retained in the appropriate system of record<sup>9</sup>. Because the records are non-supervisory and not associated with examinations, ratings, or EAs, records are not stored in the common examination platform, OASIS. With exceptions, final records are stored on the LISCC SharePoint Site → Workspace – Operating Committee (OC) → Governance Working Group → OOC Advisory Council folder → OOCAC Recommendations folder. The SC membership request change form mentioned in the “**Non-Supervisory Actions – SC Membership Change Requests**” is stored in the OOCAC Recommendations folder. Certain emails are stored in the OOCAC Recommendations folder, such as the OC Chair approval, OOC HR conflicts check confirmation, and SC membership recommendations. However, some of those emails may be shared as email strings, containing for example, the original SC membership recommendation and OOC HR conflicts confirmation. OOCAC member email votes are not stored in the OOCAC Recommendations folder, they are stored in

<sup>9</sup> Prior to October 2024, certain records (e.g., not the email correspondence) were retained and, throughout 2024 new approaches and documents were created. Emails can be found in the Board S&R OperatingCommitteeCOO shared mailbox.

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the Board S&R LISCC function *[Redacted: email address]* shared mailbox. The CS team OneNote is used as a tool to facilitate the process, as noted, all final records are stored in an official system of record.

### Section IV: Resource Management

#### Onboarding and Offboarding

The goal of the LISCC Onboarding Program is to equip individuals moving into roles within the LISCC Supervisory Program with the information, tools and relationships needed for a successful transition<sup>10</sup>. Effective acclimation into a new role results in higher levels of employee engagement and a quicker contribution rate to the business line. The LISCC Onboarding Program focuses on knowledge transfer specific to LISCC supervision. It is not intended to duplicate local entity-wide and local department-wide onboarding efforts. These programs onboard employees to the local organization and department where the individual is physically located and remain an important component of the overall onboarding experience for the employee. The LISCC Onboarding Program provides a minimum set of requirements that may be expanded upon within local onboarding efforts. The LISCC Onboarding Program is presently reserved for individual contributors<sup>11</sup> and is recommended for people managers, especially when the individual is new to LISCC or new to people management. A separate senior leadership onboarding process was established for individuals filling Operating Committee, Steering Committee, and Co-Chair roles as the required knowledge for success differs from standard LISCC Program positions (see p.19 for core onboarding information).

In contrast, the goal of the LISCC Offboarding Program is to ensure the transfer of critical institutional and supervisory knowledge to employees transitioning into LISCC roles. The program facilitates a comprehensive information inventory prior to the departing employee's transition date and an appropriate transfer of supervisory knowledge to the individual moving into the role.

The LISCC On/Offboarding Coordinator (Coordinator) is the process owner and is charged with ensuring successful ongoing operation as employees move in and out of roles within LISCC. The role requires coordination with the individual and his/her program and local managers, an introduction of the program to his/her managers, timely notification of recommended on/offboarding activities to managers, and continuous monitoring of the program to ensure training materials remain relevant over time as the LISCC Program evolves.

Given LISCC Program's matrix reporting environment, the Program requires regular collaboration between the Coordinator and both the local and program managers for the individual. Local and program managers are defined as follows:

- Individuals on a DST report directly through a local manager at the employing district only (Boston, NY, Richmond, SF).
- Individuals within one of the horizontal programs or in the Office of the OC (OOO) will typically have both a local manager (employing entity- District or Board of Governors) and program manager (for Capital, G&C, Liquidity, RRP, MAP, OOO).

<sup>10</sup> A transitioning employee is identified as an employee 1) moving within the LISCC Program, 2) moving to another group within the Bank outside of LISCC Supervision, or 3) leaving the Bank.

<sup>11</sup> A LISCC Onboarding program for managers has been identified as a future enhancement for this program.

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## Onboarding

### Part 1: LISCC Onboarding Program Structure

The onboarding program begins prior to the hire moving into the new role and is completed within six months after the start date. Content is divided into four key timeframes: pre-start, 1<sup>st</sup> week, 1<sup>st</sup> month, and two to six months. Highlights of the program include information on the key elements of LISCC supervision, a formal one-month acclimation period prior to leading supervisory work,<sup>12</sup> standing essential meetings with manager(s), connection with a peer coach, and required online learning. The program offers expanded material for individuals that are brand new to LISCC supervision and alternatively offers an opportunity to customize onboarding for those with significant prior LISCC supervisory experience. An overview of each of these items is highlighted below and described in more detail in the respective section of the manual. There are times when onboarding and offboarding occurs in a similar timeframe, as one individual moves out of a role and another ultimately moves into it. As a result, while there is a separate section devoted to offboarding later in the manual, certain administrative procedures outlined within the onboarding section will also inherently cover necessary offboarding action items that should preferably occur prior to onboarding the new individual.

### Key Elements

Key elements are categories for onboarding content identified as important standing components of the program. Individuals receive information relative to these topics throughout the course of the onboarding program, via various learning platforms (in person meetings, conference calls, online learning, etc.).

- Understanding Your LISCC Role: Individual and Team(s)
- Performance Management in a Matrix Environment
- LISCC Supervisory Program Processes
- Key LISCC Contacts: Peer Coach/Team/Partners
- LISCC Firm-Specific Information
- LISCC Technology: Access and Training
- Appropriate use of SAFR Classifications
- Conflicts of Interest (starting Q4 2022)
- Records Management

### Acclimation period

Individuals new to the organization and/or large bank supervision will complete a one-month acclimation period. The first two weeks in a new role are generally dedicated to logistical and administrative items. The acclimation period allows an additional two weeks to ensure proper opportunities to build a solid understanding of the LISCC culture, supervisory processes and tools. It also offers time to begin meeting and building relationships within the team and with key stakeholders within the broader LISCC community.

Individuals will be able to participate on supervisory assignments during the acclimation period, but not be given lead responsibilities on assignments requiring direct interactions with LISCC firms until after the

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<sup>12</sup> While newer members are given a one-month acclimation period prior to leading supervisory work, some individuals will not need the full month and can assume lead responsibilities sooner with manager approval.

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first month. Any exceptions to the one-month acclimation period will be discussed by the local/program managers.

### Recurring Meetings and Check-ins

Local and program managers are expected to hold regular meetings with one another and the new hire for role expectation clarity and development planning, particularly during the first few months. A series of meetings have been outlined with standing agenda items and suggested talking points. These are intended to provide critical information to the individual in a new role at specific timeframes throughout the onboarding program. These talking points ensure over time that individuals will receive consistent baseline information about the LISCC Program.

- Regular meetings between the local and program manager allow for discussion and alignment of objectives for the new hire
- Manager meetings with new hire: Standing agendas with suggested talking points for managers
- Status check-ins: Coordinator sends a reminder email to managers and answers questions they may have as the new employee progresses through the program

### Peer Coach

The local and program managers will select an individual with LISCC Program experience to serve as peer coach for the new hire. An effective peer coach can greatly enhance the employee's experience, offering an immediate connection when starting a new role in LISCC. The peer coach will partner with the individual, using his/her experience and knowledge to support the new employee, particularly during the first several months of the start date. The peer coach will guide the individual through necessary information for the day-to-day specifics of the role. This role will be incorporated into the peer coach's objectives for that year.

### Online Learning Content and Training

The onboarding program provides managers a structured approach for required and recommended training content, which includes several foundational bundles assigned to them through FedLearn. Additional modules can be added by managers based on the role of the individual and the level of experience in the respective risk area for the new role. These modules will be assigned to the learner via the Supervision Learning Center.

### Customization- Prior LISCC Experience

The onboarding program can and should be customized based on the individual's career experiences/skillsets. The Coordinator will work with local and program managers to ensure waivers are applied consistently and reasoning is properly documented. For example, if an individual is brand new to LISCC supervision, the hire would complete the program in its entirety. On the other hand, if an individual has been in LISCC supervision for years and is transitioning into a new role within LISCC, the program should be pared down as the individual would already understand how to navigate a matrix environment, the supervisory process, technology platforms, etc. In this case, certain required elements of the program (ex. essential meetings and online training modules, etc.) may be waived at the discretion of the manager(s).

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## Part 2: PRE-START

### Chapter 1: Team Change Notifications

#### I. Staffing Change Form

**Purpose:**

The Staffing Change Form on SharePoint serves as a notification method for staffing transitions in and out of LISCC roles. Upon completion, a notification email is automatically sent to the On/Offboarding Coordinator and other OOC teams, triggering pre-work communications with managers and essential CSI protection activities (e.g., management of security access levels for technology platforms and additions or deletions from AD/email distribution groups) in support of smooth on/offboarding transitions.

**Accountability and Execution:**

The employee's local manager is responsible for completing the Staffing Change Form when made aware of an individual's transition, preferably in advance of the anticipated transition date. Based on the information provided, the OOC will establish or restrict access levels to various platforms to protect and properly handle confidential supervisory information. The local manager is charged with ensuring, as part of entity owned onboarding/offboarding programs, that the new hire is added to or removed from any locally-managed supervisory databases and distribution lists. For LISCC, upon confirmation of an official date for transition into or out of a LISCC role, the following steps should occur:

- Local manager submits the Staffing Change Form
- LISCC access to supervisory databases and emails groups is established or restricted, as coordinated by OOC (please refer to the LISCC Access Management site for access request information)
- On/Offboarding Coordinator establishes a meeting with manager(s) to review and customize a LISCC on/offboarding plan, outlining necessary action items and/or decision points as described in this manual (additional details specific to this essential planning meeting are provided in the next section)

#### II. Notifications Email

**Purpose:**

For individuals transitioning into roles, the purpose of the notification email from manager(s) is to ensure current team members and key stakeholders are aware of the new staff member joining and can make the new staff member feel welcome and part of the team. The purpose of the notification email for individuals moving out of roles is to ensure that current team members and key stakeholders are aware of the transition and can guard against inadvertently sharing confidential supervisory information with an individual that should no longer receive this information due to a change in role.

**Accountability and Execution:**

Upon confirmation from HR of an official date for transition in or out of a LISCC role, it is the local and/or program manager's responsibility to notify their respective staff and stakeholders of the transitioning employee's hire or transfer date. For transfers within LISCC, the hiring manager should confirm with the prior manager that the transition has been publicly communicated for the prior role and is appropriate for LISCC to send welcome/introductory announcement(s). The audience for notification emails will vary depending on the role and is at the manager's discretion.

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### Chapter 2: On/offboarding Planning Meeting

**Purpose:**

This meeting is a discussion between the Coordinator and the local and/or program manager to walk through the on/offboarding plan for the individual and make decisions on whether any parts of the program will be waived and document reasons for exclusion.

**Accountability and Execution:**

The LISCC onboarding coordinator will schedule, organize, and facilitate the meeting walking through the required elements of the program. If possible, this meeting should be scheduled approximately one week before the new hire start date either via conference call or in-person. The local and program manager are responsible for working with the Coordinator to identify and share reasoning for any customized components for the individual. At a minimum, during this meeting, the manager(s) should discuss and make decisions regarding the below items:

- If the individual is moving into a role that was previously in place (versus moving into a newly created role) and offboarding documentation is available, the Coordinator will recommend that managers review this information during the Area of Focus/Engagements meeting (1<sup>st</sup> month activity); see Offboarding Program section of this manual for more information
- Select a Peer Coach for the new hire based on the Peer Coach Guidelines
- Discuss and agree on the distinction between local and System responsibilities embedded within the role
- Determine whether the individual is a candidate for the formal LFI Examiner Commission Program (ECP) and, if it is determined the new hire is eligible and will enroll in the ECP, refer the managers to the training contact at his/her respective reserve bank
- Make determinations about required online learning content based on the individual's background
- Discuss the importance for the employee to complete mandatory CSI training via the local onboarding program; the local manager must connect with the individual to acknowledge that training is completed within the first week as this will protect against CSI inadvertently being forwarded to the individual by various team members in advance of this training

### Chapter 3: Peer Coach Selection and Pre-Briefing

**Purpose:**

The purpose of the Peer Coach is to enhance the new employee's experience, offering an immediate connection when starting a new role in LISCC. A Peer Coach can improve the employee's engagement and performance and can create a more effective learning experience. The Peer Coach will serve as a resource on work rules, workplace culture, procedures, and general navigation of the LISCC model. Another benefit of assigning a Peer Coach is achieving a consistent new hire experience across the LISCC Program.

**Accountability and Execution:**

The local or program manager (in this case, the individual that will direct the majority of the workflows) is responsible for selecting a Peer Coach and conducting a pre-briefing with the selected individual regarding expectations. A Peer Coach is responsible for scheduling an initial meeting with the new employee to explain the purpose of the relationship, discuss individual backgrounds, field questions, and

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schedule subsequent recurring meetings to share information. Criteria for selecting a Peer Coach and expectations are included in the Peer Coach Guidelines. Some key action items are as follows:

- LISCC Manager of new employee identifies a peer coach for the new employee, ideally with several years of experience in LISCC supervision, and is a member of the same core LISCC horizontal program (Capital, Liquidity, G&C, MAP, RRP) or DST as the new employee
- Peer Coach schedules an initial meeting within two weeks with employee to discuss expectations, etc.
- Follow-up meetings/coaching sessions to occur on a weekly or bi-weekly basis for the first three months and then as needed
  - A commitment to keep scheduled meetings should be made by each new employee and coach
  - Between meetings, the Peer Coach and employee should maintain informal contact to check on progress and discuss any challenges

### Part 3: 1<sup>st</sup> WEEK

#### Chapter 1: Managers' Recurring Touch Base Meetings

##### **Purpose:**

In a matrix environment, it is required that the local and program managers routinely meet throughout the onboarding process, but most importantly during the first two months, to ensure consistency, review progress, and review allocation of responsibilities/assignments. At the discretion of the manager(s), the employee may be included in the managers' recurring touch base meetings.

##### **Accountability and Execution:**

Where the role has a local and program manager, it is recommended that the program manager schedule meetings on a bi-weekly basis for first two months. After two months the best practice is to continue to monthly meetings. The first meeting should occur no later than the end of the first week of the start date.

#### Chapter 2: In-Person or Virtual Welcome Meeting

##### **Purpose:**

Engagement with the local manager, program manager, or designees within the first week of beginning the new role aids in acclimating the individual to the local landscape. This offers an initial opportunity to acquaint the individual to the new role and give an overview of what to expect in the coming week and month ahead.

##### **Accountability and Execution:**

The local manager and/or program manager (or designee, if manager is away on Bank business or taking PTO) should organize a breakfast or lunch with the new team member to welcome him/her to the respective team. During the remote working posture or when a new employee starts his/her role remotely, local and program managers should schedule a virtual call either together or separately within the first week of the individual's start date.

#### Chapter 3: LISCC Program Overview and Team Connections

##### **Purpose:**

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Given the span and complexity of the LISCC portfolio, an early introduction to the organizational structure and regular collaboration with team members and stakeholders are important to facilitate a faster and more effective transition into the role. Beyond the direct team, stakeholders include multiple individuals within the horizontal program and/or DSTs with responsibility for similar risk topics.

### **Accountability and Execution:**

Within the first week, the manager (or delegate) should introduce the employee to the LISCC organizational and supervisory structure. The following information should be reviewed at a high level to ensure the individual has an understanding of how his/her role and team fits into the program.

- LISCC homepage: Org charts, supervisory process, LISCC roadmap, etc.
- Matrix Environment: geographically disbursed horizontal and vertical teams
- Local/Program dual reporting environment
- Proper handling of CSI: immediate key points to note for a new hire as well as general do's and don'ts of supervisory communications (particularly when a new examiner has never worked off-site at a firm)
- Proper use of SAFR classifications
- Divergent views (light touch as there is a separate meeting to discuss this topic in-depth)
- Conflicts of Interest: available Q4 2022
- Records Retention

This is the time to begin the process of making connections with direct team members and key stakeholders, based on role, across the broader LISCC community. The manager (or delegate) should work with the individual to create a comprehensive list of contacts that he/she will need to contact frequently. This may include individuals across DSTs and Programs, relevant individuals at firms, and any internal workgroups or subcommittees (depending on level and involvement). Prioritization of stakeholders will help facilitate the process for the individual.

## **Part 4: 1<sup>st</sup> MONTH**

### **Chapter 1: Individual Objectives Discussion**

#### **Purpose:**

Performance management is an important part of career development. It supports each individual's contribution to the LISCC Program by ensuring that individuals are clear about their performance toward meeting expectations. A key part of this is the development of individual objectives. Program and local managers should collaborate early and often as partners in this development process.

The purpose of this meeting is to discuss direct job responsibilities associated with the role. This ensures all stakeholders (local, program, and employee) have the same understanding of expectations early in the process. The manager should provide the employee with a list of high-level projects/assignments and discussion how their role engages with roles of other team members. Where possible, the manager should articulate high level timelines for assignments to aid in prioritization.

#### **Accountability and Execution:**

For roles where there is a local and program manager, the program manager is responsible for scheduling the meeting. The local manager is responsible for ensuring the individual's goals and objectives are entered into the local entity's performance management system. During the "pre-start" phase, the

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manager(s) will have met to determine goals and objectives, both at the local and program level, for the employees (should have occurred as part of the initial onboarding planning meeting referenced above in chapter 2).

The local and program managers will meet with transitioning employee to discuss performance objectives, within the first month, preferably within the first couple of weeks. When outlining role responsibilities and expectations, team dynamics, culture and communication preferences should also be discussed.

Additional information about LISCC Performance Management can be found on the HR Performance Management Section of the LISCC SharePoint Site. Also refer to local entity guidance on Performance Management.

### Chapter 2: Areas of Focus/Engagements

#### **Purpose:**

The purpose of these meetings are to highlight items and engagement processes with the team and other LISCC stakeholders required to understand the risks, business lines, initiatives, planned supervisory work, and current findings of the individual's primary area of responsibility. These meetings should also be used to transfer information from the previous employee as part of the offboarding process, if applicable.

#### **Accountability and Execution:**

These meetings should occur between weeks 2 and 4. The manager will meet with the employee to discuss key aspects of the role, essential partnerships within the LISCC Program specific to the role, and content knowledge transfer provided by the offboarding process for the individual previously in the role (unless the role is newly created). This engagement may involve multiple meetings and/or review of key documentation.

### Chapter 3: Divergent Views Discussion

#### **Purpose:**

The Supervision Divergent Views Program (DVP) is the framework establishing a common approach that System staff will follow to present and consider divergent views related to supervisory matters. Expression and open facilitation of divergent views are important components of the examination process. This program integrates these principles and practices into supervisory decision-making.

#### **Accountability and Execution:**

The local manager will host a meeting to discuss the best practices and associated programs related to the Divergent View Framework (including the Independent Channel) and discuss any questions the individual may have. Managers should notify the new employee of the requirement to complete the Divergent Views Rapid Response training at this meeting.

#### **Reference/training materials required:**

Divergent Views Homepage

Rapid Response: An Introduction to the Divergent Views Program

AD 17-7 / CA Admin 17-7

Guiding Principles and Suggested Practices Information Sheet

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### Chapter 4: LISCC Program Engagement

**Purpose:**

It is important for LISCC members to remain abreast of ongoing Supervisory guidance and activities taking place across the Program. The listed resources will support familiarization with the LISCC community and promote networking and transparency.

**Accountability and Execution:**

The local and/or program manager will share the recommended resources with the new hire. The employee should opt-in to receive real-time S&R guidance notifications and listen to podcast episodes as time permits.

- LISCC Program Podcast: Behind the Scenes: This series launched in May 2020 and is designed to share a bit of the "Behind the Scenes" of the mission-driven, critical work currently underway in our constantly evolving environment as well as help staff get to know their colleagues better. The episodes are approximately ten minutes in length and listeners can expect new episodes throughout the year.
- S&R Guidance Notifications: It is recommended that LISCC staff members sign up for notifications so they can be informed of Board-issued guidance as it becomes available. Since Board staff review SR and AD Letters for accuracy, subscribers will typically receive an e-mail notification within one or two working days of Board-issued guidance being published on the public website and/or FedWeb.

### Chapter 5: Online Learning Content and General Training

**Purpose:**

The online learning content provides a broad perspective of the LISCC Supervisory Program that serves as important baseline knowledge regarding the program in its entirety. If there is in-person training, or modules that the manager(s) determine is important for the employee's success during the initial month with LISCC, this will be recommended to the employee as well during this time frame.

**Accountability and Execution:**

The individual should access the modules listed below via FedLearn and complete within the first month. In addition, the local and program manager should identify any additional modules in FedLearn that are pertinent to the specific role, taking into consideration the individuals current skillsets, and "recommend" those modules in the Learning Center. Links to the modules will then display under the "Manager Recommendations" section on the user's Learning Center homepage.

The LISCC Learning Plan can be used as a supplementary resource for LISCC-relevant information and may be incorporated into the individual's development plan. The program and local manager are responsible for guiding the targeted content, order, and completion expectations. The LISCC Learning Plan is not required in its entirety as the modules will be assigned based on the member's existing knowledge and experience.

**Required content:**

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- LFI ECP Independent Online Content<sup>13</sup> (Length of time varies depending on time used for Foundations courses)
  - LFI Foundations: Business of Large Financial Institutions
  - LFI Foundations: Large Financial Institution Supervisory Process
  - Principles of LFI Supervision
  - Fed Foundations: Central Bank, Business of Bank Supervision
- LISCC Supervisory Program Bundle<sup>14</sup> (4 hours, 17 minutes)
  - Conversation with LISCC OC Chair, **[Redacted: name]** (40 minutes)
  - LISCC Program Overviews (33 minutes in total, 4-6 minutes each)
  - 2022 LISCC Program Town Hall (1 hour, 34 minutes)
  - 2021 LISCC Program Town Hall (1 hour, 30 minutes)
- LFI Supervisory Perspectives Video Series (1 hour, 31 minutes)
  - Introduction to LFI Supervision (8 minutes)
  - Interdisciplinary Approach to Supervision (17 minutes)
  - Tailoring Supervisory Expectations (13 minutes)
  - Cross Firm Reviews (8 minutes)
  - Stress Testing (17 minutes)
  - Supervisory Communications (28 minutes)

### Part 5: MONTHS 2-6

#### Chapter 1: Online Learning Content

##### **Purpose:**

The online learning content provides a broad perspective of the LISCC Supervisory Program that serves as important baseline knowledge regarding the program in its entirety.

##### **Accountability and Execution:**

The individual should complete the remaining modules within the LISCC Supervisory Bundle, as well as any additional modules directed by the manager, by six months of the start date in the new role.

##### **Description:**

LISCC Supervisory Program Bundle

Individuals should review the most recent townhall and module for their primary area within the first month. The remaining videos detailing each of the other core horizontal programs (Capital, G&C, Liquidity, RRP, MAP, DST, and OOC) can be completed within the 2-6 month timeframe.

#### Chapter 2: Horizontal / DST Engagement Follow Up

##### **Purpose:**

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<sup>13</sup> Team members that are part of the formal LFI ECP will be assigned a fuller set of courses, which already include the above modules, and should instead follow the path assigned in FedLearn.

<sup>14</sup> In the first month, individuals should review the module pertaining to the risk area for their individual role. For example, if on the DST covering liquidity, review the module for the Liquidity Program.

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Within the first six months of joining LISCC, the individual should liaise with peers in related roles throughout the broader LISCC Program to obtain additional peer research/reports, supervisory information related to the role. This engagement will involve multiple meetings to broaden supervisory peer perspective in the respective content area. For example, a DST employee focused on capital/liquidity should engage with counterparts in the horizontal capital/liquidity teams (and vice versa) to understand risk trends and peer firm issues.

### **Accountability and Execution:**

LISCC Program Manager schedules meeting with transitioning employee to discuss engagement and collaboration expectations. The individual should begin outreach during the 2-6 month timeframe to start consolidating information, via meetings and review of reports (generated internally by the Fed and externally by firms) to expand base of knowledge across the LISCC portfolio related to the specific area of focus.

## Offboarding

### Part 6: LISCC Offboarding Program

#### Chapter 1: Offboarding Notifications

Refer to Part 2: Chapter 1, which describes the notification process. All managers are responsible for sharing the departing employee's information with the local and/or program point of contact as soon as possible, ensuring access to confidential information and other systems is appropriately handled.

#### Chapter 2: Offboarding Template

### **Purpose:**

Ensures institutional and supervisory work of transitioning employees is comprehensively inventoried before the employee's transition out of a role to enable effective knowledge transfer to the incoming individual. Proactive management of knowledge transfer is critical and this process ensures that knowledge is not lost when an employee transitions out of their position. Proper hand-offs reduce the potential and risk for disruption to work and deliverables.

This information includes firm-specific supervisory events recorded in C-SCAPE, issues management (i.e., primary secondary owners of MRA/MRIA/Enforcement Actions, firm specific and internal key meetings and MIS, internal and external key contacts (Bank, firm, other agencies), committees the examiner is participating on, and or assigned to review by firm, as well as High Priority Work Groups, Projects and or assignments.

### **Accountability and Execution:**

When made aware of an employee's transition out of a role, the local manager should immediately initiate the offboarding requirements described below.

The transitioning employee will:

- Complete each section of the LISCC Offboarding Knowledge Transfer Template (where applicable), erring on the side of inclusion
- Meet manager(s) to discuss the information captured in the template and come to an agreement on the work/ knowledge to be transferred and captured in the applicable system(s)

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- Sign-off on the template and forward to the manager(s), preferably within three days of the official transfer date

The manager of transitioning employee will:

- Upon notification of the transitioning employee's intent to depart a LISCC role, initiate the LISCC Offboarding Knowledge Transfer Template when the following conditions are met:
  - The program intends to post and fill the vacancy
  - The responsibilities and priorities of the future position overlap with those of the current role requiring knowledge documentation and transfer to the next job incumbent
- Meet with the transitioning employee to discuss the information captured in the template and come to agreement on the work/knowledge to be transferred and captured in the applicable system(s)
- Sign the template and post in a team database prior to the individual's departure. The template is used during the onboarding process for the individual filling the position vacancy
- Complete the Knowledge Transfer Template on the employee's behalf when the employee leaves the Bank for a banking institution as access to supervisory information will be restricted at the time of notification

On/Offboarding Coordinator:

- The On/Offboarding Coordinator communicates a departing employee's intent to work for a financial institution to the OOC Technology and Reporting team
- The OOC Technology and Reporting team will subsequently trigger a notification to the Quality Assurance team responsible for determining the need for a workpaper review

## Training and Development

Within the LISCC Program, we see the ongoing enrichment of our workforce as critical to keeping us agile enough to meet the challenges guided by our mission and equipping Program members to tackle any future issues that arise. We do this by understanding the current skills of our workforce, focusing on the key elements that we believe will ensure preparedness and success, and considering what the future may bring.

Training and development take several forms within the scope of a national program. First, our workforce receives a great deal of training and development through their employing entities. Sometimes this takes the form of full rollouts of required or important training such as information security or harassment training; however, a great deal of personal development also occurs at the local level. In LISCC, we encourage a strong partnership between Program and Local Management to ensure that both required and personal development needs are being met.

There are also times when additional training is required for participation in the LISCC Program workforce. That may take the form of specialized information regarding LISCC conflicts protocols, record management within a national program, or customized content meant to supplement one's examination breadth of experience. The LISCC Program will provide this information annually or as required to ensure that the LISCC workforce understands and functions well within their unique responsibilities. LISCC requirements will apply to LISCC Program team members, leaders and non-leaders, with the exception of:

- Individuals with less than 50% dedication to the LISCC Program as per the LISCC roster

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- LISCC Steering Committee Members
- LISCC Committee Members

Additionally, situations occur when a team member or group of individuals need “just-in-time” training prior to an assignment or when a new situation arises. While the LISCC Program capitalizes on Rapid Response and other resources provided by the Supervision Learning Center, there may also be on-the-job training for the specific needs of the situation. This is generally administered and coordinated within the LISCC portfolio programs.

LISCC Program Human Resources consults with portfolio programs to determine any necessary training needs and potential resolutions to those needs. This occurs on an ad hoc basis and through more formal programs such as workforce planning efforts including Workforce Analysis and Succession Planning.

### LISCC Program Competencies

A tailored set of competencies for the LISCC Program was developed in 2019. These competencies are reviewed regularly to ensure that they continually describe the behaviors that correlate with successful performance and persistently move the LISCC Program in a positive direction. The LISCC Program encourages Program Managers to discuss these competencies with staff on both an annual and ad hoc basis.

### Examiner Commissioning

We are directed by AD Letter 18-8 which provides the guidance for how we define the LFI ECP framework for our LISCC Program. Through this document and regular communication with our workforce and programs, we maintain a list of the LISCC roles requiring a commission. However, the LISCC Program promotes the continual professional development of our entire workforce and encourages broad enrollment into the LFI ECP. Leaders are committed to providing the input and flexibility for individuals participating in the program.

We closely monitor the progress of individuals enrolled in LFI ECP and partner with their employing entities to help ensure success. A roles and responsibilities document for each aspect of AD Letter 18-8 has been developed in conjunction with our local learning partners across the FRS. While in general, much of the enrollment practices of the employers are followed and upheld, the document specifies where LISCC involvement is necessitated. The LISCC Program supports local Reserve Bank/Board practices and expectations around participation, progress, and completion of the ECP programs.

The Provisional Commission program may be utilized for qualifying individuals hired into a LISCC role requiring commission. LISCC Human Resources will make the request to the Board prior to an offer being made. If accepted, the individual will be required to comply with all aspects of the Provisional Commission program and complete assignments within the structured timeframe. If the individual fails to progress or comply with the program, an attempt will be made to talk with the individual and understand the situation. In consultation with the LISCC leadership, the employing entity of the individual and the Board’s Learning Strategy and Oversight group, we will determine an action plan to address the situation.

Starting in 2022 2Q, the completion progress for LISS LFI ECP participants and passing rates for the proficiency exam will be reported in the quarterly LISCC Executive Report. We continue to acknowledge and celebrate those who pass the proficiency exam in the LISCC Program bi-weekly newsletter.

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### Hiring and Recruiting

The LISCC Program strives to ensure an inclusive and transparent hiring process. We incorporate principles of diversity, equity and inclusion to foster an environment within each step of our process and uphold strong partnerships with our local entities to instill qualified and impactful leadership into the LISCC Program.

The LISCC hiring process applies to national leadership positions in the LISCC Program. National leadership positions include: Co-Chairs<sup>15</sup>; PLG Leads; PLG members; HTLs; DHTL; Operations Leads; and OOC Function Leads. These national leadership positions follow the centralized national posting process within the LISCC OOC as outlined below. DST Lead positions are posted by the local Reserve Banks. DST Lead positions are subject to maximum time in role limitations (see AD 18-8); and as such may require movements within the role that are not posted in order to achieve continuous quality within the Dedicated Supervisory Teams. Individual contributor positions are allocated to a specific Reserve Bank or the Board, where recruitment is also handled by the local entity's recruiting team. While DST Lead roles and individual contributor roles are posted locally by the respective Reserve Bank, these roles are promoted and advertised within the LISCC Program as appropriate to attract a wide range of qualified candidates.

#### Pre-Posting Steps for hiring manager:

- When aware of a national (leadership) job vacancy, inform LISCC HR and the Recruiting Coordinator
  - Hiring Managers should reach out to LISCC HR prior to contacting local HR.
  - If needed, LISCC HR will share a sample of a position posting and interview guide if available; and will schedule intake meeting (to discuss timing and next steps;)
- Review the job posting and consider changes that could be made to enhance skill sets, while incorporating LISCC competencies
- Consult with LISCC HR on current needs of the team
- Finalize interview questions and send back to LISCC HR
- Consider appropriate individuals to serve as panelists for first and second round interviews. Note: Second round interviews should only be used when a decision cannot be made after first round interviews.
  - LISCC HR will make suggestions to the hiring manager for establishing diverse interview panels including, but not limited to, race, gender, staff level and areas of expertise. Panels may be comprised of hiring managers, employees who will interact with the person in this position, key stakeholders, steering committee members in the program, person(s) external to the core team but where there are inter-dependencies in the work, LISCC HR, and steering committee members from a different program or external to the LISCC Program as applicable.
  - The hiring manager must consider how long the position should be posted. Best practice is 10-15 business days.
- Note: *Per the AD 18-8 letter: If the position requires a commission:* PLG Lead, PLG member, and DST Lead or equivalent: If **not** currently holding a commission, the final candidate may be eligible for a *provisional* LFI commission based on experience:
  - Refer to AD 18-8 for additional details.

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<sup>15</sup> Each horizontal program except MAP will have one Reserve Bank Co-Chair (posted nationally) and one Board staff Co-Chair (posted locally at the Board). Each LISCC Reserve Bank will have at least one DST Co-Chair (posted locally).

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### Job Posting:

- LISCC HR will post the role on the LISCC Job Opportunities Site (frb.gov) using the appropriate LISCC role description<sup>16</sup>
- LISCC HR will collect resumes and address any concerns from applicants during the posting period
- LISCC HR will conduct a conflicts of interest check for internal applicants, who are granted an interview, and note any conflicts that individual may have with LISCC Program institutions

### Interview Preparation:

- LISCC HR will discuss next steps and interview preparation with the hiring manager
- The Hiring Manager will confirm first round interview panelists and inform the individuals of their role in the hiring process
- The Hiring Manager will request that the interview panelists clear time on their calendars to accommodate interviews following the close of the posting period
- The Hiring Manager will ensure the panelists remain consistent and that they use standardized interview practices for all candidate interviews

### Applicant Review:

- LISCC HR will collect resumes from interested applicants
- LISCC HR will share resumes with the hiring manager at the close of the posting period or as required for the situation/management team
- After reviewing information submitted by all applicants, including potential conflicts of interest, the hiring manager will ask LISCC HR and the LISCC recruiting coordinator to schedule interviews with the candidates selected to move forward in the process. To the extent possible, a diverse pool of candidates should be selected.
  - LISCC HR will send invitations to candidates and the interview panelists via Outlook with the job description and candidate's resume embedded
- LISCC HR will inform the hiring manager of any conflicts of interest requiring recusals that an applicant may have, if applicable, prior to scheduling the interview

### Assessment:

- LISCC HR will inform applicants via email when they are NOT selected to move forward to the interview phase
- LISCC HR will inform candidates moving onto a 2<sup>nd</sup> round interview
- Following each interview round, the hiring manager and panelists should meet to discuss each candidate's qualifications and provide input
- Following the first-round interview panelist discussion, the hiring manager will decide that either an offer will be extended to a candidate, or a second round of interviews is required. Note that the panelists act in an advisory role and that the final decision lies with the hiring manager.
- If a second round is required, the hiring manager will identify and send LISCC HR the names of the interview panelists and the interview questions that will be asked. The scheduling process will be the same as it was for the first round.

### Offer:

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<sup>16</sup> If an applicant has a question about the local grade/compensation for the position, LISCC HR will engage Local HR to determine what the most appropriate local job is for the LISCC role.

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- When a role requires a commission and the selected candidate is not commissioned, the individual must seek a Provisional Commission and the offer must **not** be extended until the Provisional Commission is approved
- If the decision is to move forward with an offer, the hiring manager notifies LISCC HR of the candidate's name and local entity.
  - LISCC HR will confer with the local entity to ensure appropriate local role assignment and agreement with the offer. This must occur prior to the candidate being informed of the selection.
  - The local HR team will engage the hiring manager for any questions about the role itself. Compensation discussions should take place between the local HR and local manager.
- Prior to any communications with the candidate, the hiring manager should notify LISCC Communications to discuss a communications plan
- The hiring manager will notify LISCC HR when the candidate accepts (or declines) the offer
- The hiring manager will complete the staffing change form and must inform LISCC HR of the reporting structure
  - LISCC HR will share information with OOC Technology and Reporting so that the roster accurately reflects new reporting structures upon effective date.
- The national posting process ensures fair selection of candidates for LISCC leadership positions, which may result in changes to the LISCC SLE. In these situations, LISCC HR will notify all impacted Reserve Banks and the Board to ensure proper SLE allocation.

### Workforce Analysis

It is critical that the LISCC Program continually monitor aspects of its workforce to ensure the Program has the skills and resources to meet current and upcoming challenges and keep our workforce engaged in personal development. AD Letter 18, as Section 5.1 (Workforce Analysis) states:

*The local organizations workforce analysis should provide information on staff skill gaps, including current and future leadership and professional skills, staff turnover, and anticipated future risks.*

*The local organization must complete workforce analytics annually. The analysis, and any action items stemming from the analysis, should be documented and discussed among the management team.*

To fulfill this requirement, LISCC Human Resources will:

- Utilize previous succession planning data (see Succession Planning section below), along with system information, including characteristics important for program leader roles and the aggregate strengths and limitations reported for individual succession candidates, to provide a base of skills for analysis.
- Present aggregate information to Co-Chairs for consideration and confirmation. We will ask Co-Chairs, in conversation with LISCC HR to:
  - Identify future state activities, actions, and changes and along with any associated risks.
  - Confirm whether the identified skills are necessary to meet the current and future needs of the portfolio program, identify any additional skills needed, and determine the level of importance for each in both the current timeframe and in the 3-5 year future forecast.

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- Assess the current functioning of the portfolio program workforce *for* each of the skill sets. This will be done aggregately for the portfolio and will not attempt to assess the skills of each team member.
- LISCC Human Resources will analyze all portfolio data and create a snapshot of where the LISCC Program stands in terms of skill gap analysis and current staff turnover trends to present to the LISCC OC. This information will be presented as both a whole and broken down by the LISCC Program portfolios for awareness purposes and discussion on approaches to fill any identified workforce skill gaps.
- During follow-up meetings with Program Portfolio Co-Chairs, LISCC Human Resources will suggest action items and ask portfolio programs for commitments to workforce development according to need.

### Succession Planning

To mitigate the risk of sudden leadership changes and ensure that the LISCC Program has a well-prepared slate of potential candidates for key roles, LISCC Human Resources conducts annual succession planning for leadership roles. These roles include:

- All Program Co-Chair roles
- All PLG roles
- COO

Periodically this process will include meetings that discuss each role and all of the potential candidates for each role. Intermittent, processes will include an abbreviated process that draws upon the previous information, confirming, eliminating or adding candidates and updating both strengths and opportunities for improvement for these candidates. The overall practice will be reviewed annually and revised accordingly, but will generally include the following steps:

- Reminders of DEI best practices and appropriate mindset for Talent Development and Succession Planning
- Reviewing and confirming previous year's succession plans. These are shared in advance with the Co-Chair teams for the portfolio programs via email. Additions, deletions or updates are requested.
- Identification of "Key Talent" within the program
  - Key Talent is defined as an individual who strongly demonstrates multiple LISCC Program competency areas (Agility, Communication, Collaboration, Intellectual Curiosity, Critical Thinking, Problem Solving) and makes a significant difference within the team
  - Key Talent can be at any level within the organization (individual contributor, manager, leader, etc.)
  - Key Talent is generally considered to have potential to take on greater capacity through managerial roles or expanded scope of responsibility
  - The loss of a Key Talent individual would create a hole within the team
  - Key Talent considerations should include the diversity within the team
  - Less than 10% of the workforce is considered Key Talent
- Generation of potential activities and direction to develop Key Talent over the next 12 months
- Analysis of and consideration for the overall demographic composition of the candidate pool as a Program and within each portfolio program; this information is shared with Co-Chairs and the OC as a whole
- Sharing information with Reserve Bank/Board Heads of Sup and HR Teams

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- Request for LISCC Co-Chairs and others to have developmental conversations with identified talent; guidance is provided

LISCC will share succession planning information about specific employees with their employing entity so that there is a coordinated development effort and Reserve Banks may add input to LISCC enrichment activities for the individual.

Generally, the succession process and outcomes are kept confidential within the LISCC Program. As roles become open, LISCC HR will share succession planning candidates and associated information with the hiring manager for consideration. While candidates may be approached and encouraged to apply, they will only be considered for a role if they submit an application via LISCC Program processes and compete with other applicants for the role. This ensures an equitable process and allows for us to select the most qualified candidates without restriction.

Succession planning data is maintained within the LISCC Human Resources confidential and restricted SharePoint site.

## Performance Management

Performance management is a key component of the LISCC Program Workforce Strategy not simply because we require documentation, but because we know that in order for our workforce to truly achieve our LISCC Program competencies, they need the coaching and grooming that takes place within a performance management process. It starts with setting expectations for the performance cycle, includes on-going and meaningful conversation about progress against those objectives, and then an evaluation of the effort and the impact attained. In a matrixed management environment like we have within the LISCC Program, collaboration and communication are critical elements to success.

### Employer Specific Information

Each of the Reserve Banks and the Board of Governors has their own set of expectations and due dates for year-end performance reviews. LISCC Program Management is directed to refer to information shared by that employer and ensure a solid line of communication exists between both them and the Local Manager throughout the process. The overall process should be a partnership that ensures both parties are well informed of the documented message and ratings, but also fully engaged in the performance conversation with the employee.

While most Reserve Banks have moved to common rating anchors, how these anchors are defined vary slightly across entities. It is important that managers understand the differences in rating definitions for their matrixed team and are encouraged to review annual performance management messaging for more information. This will include the due dates for each entity regarding performance management activities.

The following guidance is provided to managers regarding diversity, equity and inclusion and performance management:

### Performance Objectives

Most Reserve Banks and the Board of Governor require annual performance objectives or goals. While the LISCC Program leverages those set by the individual's employing entity, it is important that LISCC

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specific goals are also captured and measured. The collaborative relationship between the Program and Local Managers allows this to happen.

Some LISCC Portfolio Programs set common objectives for all participants. The Program Manager should ensure the inclusion of these common objectives into the individual's performance goals for the year. That may be accomplished by adding new, separate objectives or incorporating this guidance with objectives established by the local management or entity. LISCC encourages a transparent process for both local and program management with the employee throughout the performance year.

### Diversity, Equity, and Inclusion

The LISCC Program sees the importance of ensuring that our performance management programs support the diversity, equity and inclusion of our workforce. We include appropriate reminders, tips and/or training in this space as deemed appropriate. These may include:

- Reminding leaders to consider the **entire year of performance** by referencing notes and emails for input into someone's performance over the full period of time.
- **Use multiple feedback sources.** Gathering information from others to ensure that one is not looking at someone's performance and impact through a single lens.
- In preparing for conversations and written feedback, **checking one's language** and considering the possible reactions of the feedback recipient. Conscientiousness is stressed regarding one's words, phrases or tones that potentially carry stereotypes or offend regarding gender, ethnicity, age, or other factors.
- Leaders must **reinforce inclusive behaviors** by ensuring that they are inviting the individual into the conversation, listening to the individual's assessment of their performance and weighing this appropriately with productivity and impact.

### Competencies

Many Reserve Banks and the Board of Governors have competency models with attributes that are rated at year-end as part of the performance management process. As we know, these competencies change over time, and we encourage leaders to familiarize themselves with these competencies by reviewing the employer's website for information and partnering with the local/program manager to discuss the competencies and related performance prior to making any ratings.

We also keep in mind the **LISCC Program set of competencies**. While these are not rated competencies, they should be reviewed as part of an overall assessment of performance and incorporated into the conversation as appropriate.

### Performance Conversation

While the documented assessment is the record of someone's performance, the conversation that occurs between managers and the employee may have significant impact on how the employee perceives the feedback. Honest, thoughtful feedback is critical. Managers must be sure that the employee hears the full message, both what they have done well – so that they keep doing it – and what needs to be improved so that they alter their behavior for more positive results.

LISCC promotes the following tips to encourage productive performance management conversations:

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- Prepare for the review. Identify specific examples of performance over the review cycle. Share talking points with the Local or Program Manager partner prior to the conversation.
- Schedule an in-person meeting or a video call for the review. Be ready to make eye contact and read body language throughout the conversation.
- Ensure an open conversation and listen. State what did or did not have a positive impact and discuss why. Invite the employee to share their views and ways to be more effective in the future.
- Tie performance to the bigger picture. Discuss how behaviors effect the team, the specific program, and the overall LISCC Program.

The LISCC Program will continue to gather and disseminate to LISCC managers any appropriate information from the employers regarding due dates, processes and procedures.

### Exam Feedback

Some of the portfolio programs within LISCC have created or adopted an examiner feedback process. These processes are meant to provide timely feedback to examiners for each event by incorporating both real-time and post-exam feedback. Feedback is shared with the local and program management for incorporation into a comprehensive view of performance for the individual. While an overall process for the LISCC Program is still being considered, these models have engaged LISCC OOC and LISCC leadership for input and are consistent with LISCC Program best practices.

## Section V: Conflicts of Interest Standards Applicable to the LISCC Supervisory Program

The LISCC Program Office of the Operating Committee is responsible for implementing the "Conflicts of Interests Standards Applicable to the Large Institution Coordinating Committee Supervisory Program". This set of standards and guidelines has been implemented for the LISCC Program in 2023. The Human Resources function within the OOC will provide oversight as these standards are in place and ensure that all LISCC Program participants are able to perform their responsibilities in accordance with these standards. Many of the actions or procedures described below are performed in conjunction with Reserve Bank or Board of Governors conflicts and/or ethics protocols.

While the Reserve Banks, the Board and the LISCC Program are all providing oversight of our team member's conflicts and ensuring compliance, it is ultimately up to the team members themselves to ensure that they remain free of conflicts and report all required information on their appropriate form within the COFI application. LISCC team members have resources to leverage when questions arise or if they need to consider future actions. These resources include their Program and Local Management, LISCC Conflicts staff and their Reserve Bank's Ethics or Conflicts team.

The following information provides both general information about the LISCC Conflicts of Interest program, but also the Guiding Principles under which we will operate and the specific procedures we will endeavor to follow as we provide oversight to the conflicts for all LISCC team members. Our appendix includes a collection of the tools which have been developed to guide decision making within this space.

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### LISCC's Guiding Principles for Conflicts of Interest Program

#### 1. Overall Program Standards

The LISCC Program is highly cognizant of the responsibility to maintain public trust and will work to ensure that all our team members are free from any conflicts with LISCC firms that would potentially erode that trust. Therefore, we will adhere to the guidance for conflicts of interest set out in the Federal Reserve Administrative Manual (FRAM), the practices of the Reserve Banks and Board of Governors, and the "Conflicts of Interest Standards Applicable to the LISCC" issued by the Supervision and Regulation Division LISCC Oversight Section.

#### 2. Application of Guidance

While Reserve Banks and the Board all follow the FRAM accordingly, interpretation of nuanced situations may have different outcomes. Therefore, the LISCC standards represent the minimum expectations applicable to LISCC Program participants and more stringent requirements may be applicable to LISCC Reserve Bank participants at the discretion of their respective Reserve Bank.

- a. Any conflicts that are considered to represent an actual or unacceptable risk will be fully reviewed by LISCC Conflicts staff, respective Reserve Bank Conflicts Staff, Board Legal / conflicts (if applicable), and the LISCC Program COO and OC Chair.
- b. Other risk categories will be reviewed and managed between the LISCC and Reserve Bank conflicts staff.

#### 3. LISCC Leadership Conflicts

Candidates for, and incumbents within, LISCC leadership/management positions must be free of conflicts.

- a. This will include the following roles:
  - i. LISCC OC Chair
  - ii. LISCC Program Co-Chairs
  - iii. LISCC PLG Members and Leads
  - iv. Horizontal Team Leads
- b. If a conflict for one of these roles is identified, it will be evaluated thoroughly and discussed with LISCC Conflicts staff, respective Reserve Bank Conflicts Staff, Board Legal/ conflicts (if applicable), and the LISCC Program COO and OC Chair on a case-by-case basis. If a waiver is required, it will be processed as outlined in Section 5 below.
- c. LISCC Operating and Steering Committee Members may participate in events if they have a single recusal from a LISCC firm in place and they follow all recusal requirements regarding that firm. Certain conflicts may prevent participation in specific events, if this occurs it will be documented in the LISCC Conflict Tracker and on the individual's disclosure form in the COFI application.
- d. Steering Committee members must also adhere to the LISCC Program Steering Committee Parameters, outlined in the document below, during their participation on the Committees.  
***[Redacted: hyperlink to internal website to which the parameters are posted]***

#### 4. Unique Roles Within LISCC

In addition to leadership roles as outlined above, there may be other unique individual contributor roles within the LISCC Program that must be free of conflicts and recusals to be performed effectively. Likewise, some teams may be of such a small size that conflicts and recusals within the team will prevent them from operating effectively. This information will be carefully considered and discussed with applicable parties to determine if any actions must be taken.

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### 5. *Multiple LISCC Firm Recusal*

Team members within the LISCC Program will not be permitted to be simultaneously recused from multiple LISCC firms due to conflicts of interest. It has been determined by LISCC leadership that multiple recusals for one individual would limit that individual's ability to effectively complete their job relating to horizontal supervision and monitoring responsibilities. Any exceptions to this will be reviewed on an individual basis.

### 6. *Borrowing*

In general, all LISCC staff (and their immediate family members<sup>17</sup>) must refrain from soliciting any borrowings from a LISCC firm while in the LISCC Program.<sup>18</sup>

- a. Candidates for LISCC leadership roles will not be permitted to hold any impermissible borrowings with a LISCC firm, even if the borrowing was previously grandfathered.
- b. If a LISCC team member secures a borrowing from a LISCC firm while in the LISCC Program, they will be required to divest of that borrowing within 90 days of notification or risk their ability to participate in the LISCC Program.

### 7. *Assets/Investments in LISCC Firms*

In general, all LISCC staff (and their immediate family members) must be free from holding any assets with a LISCC firm while in the LISCC Program. The LISCC Standards include exceptions for spouse and dependent children's assets that meet specific criteria. These situations will be evaluated on case-by-case basis and appropriate measures will be determined.

### 8. *Family Member Employment with a LISCC Firm*

If a LISCC team member has an immediate family member<sup>19</sup> employed by a LISCC firm, the situation will be evaluated on a case-by-case basis to determine if the conflict requires a recusal and/or any other actions.

- a. Familial relationships are described in the FRAM, and the "Conflicts of Interest Standards Applicable to the LISCC", but will generally include spouse/domestic partner, children, parents, and siblings. Other family relationships may create a conflict and will be considered on a case-by-case basis.
- b. Candidates for LISCC leadership roles, as defined above, will not be permitted to have recusals from a LISCC firm due to conflicts involving family members employed at a LISCC firm.
- c. In-law familial relationships will generally not be considered to require a recusal unless it is determined by the local conflicts or ethics team to create an appearance of a conflict.
- d. All case-by-case evaluations will consider the role of the individual LISCC team member, the role of the family member at the LISCC firm, the interaction between the two roles, and the relationship itself.

### 9. *Participation in Supervisory Activities*

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<sup>17</sup> Immediate family members include spouse/domestic partner and dependent children.

<sup>18</sup> For the initial implementation of the of the "Conflicts of Interest Standards Applicable to the LISCC", the LISCC Program will allow for (or "grandfather in") most previously held borrowings with the appropriate recusal in place from any work with that firm (excluding LISCC leadership roles). Any grandfathered borrowings must not be refinanced with a LISCC firm.

<sup>19</sup> For this section, family members include the staff member's spouse, domestic partner, dependent or non-dependent child(ren), parent, or sibling.

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- a. Schedulers (more specifically, LISCC Exam Support Team members (LEST) and authorized operational team members who have scheduler permissions) will use conflict information from OASiS, imported from the COFI application, to determine if staff are eligible to participate in supervisory events.
  - i. LISCC staff are expected to notify their LISCC Program Manager if they are scheduled on an exam that involves an institution with which they have conflicts, **prior** to commencement of the supervisory event.
  - ii. When a LISCC staff member is flagged as having a conflict on a scheduled supervisory event, schedulers will reach out to the LISCC COFI team via the group mailbox.
  - iii. LISCC COFI Team will review the conflict and, with input from the local ethics team if needed, provide details on the conflict that describe what the examiner's restrictions are.
  - iv. LISCC COFI Team will then copy the employee and the program manager on the response to allow for their input if needed.
  - v. LISCC COFI Team provides schedulers with information to either override the conflict in OASiS or remove the individual from the event, looping in respective the Program Operations Lead.
- b. Schedulers should conduct the COFI review at a "reasonable time" prior to the commencement of the supervisory event to allow for any necessary staffing adjustments while also ensuring that the most recent conflict information in the COFI application is referenced for the review.
- c. Due to the volume of COFI reviews required for relatively larger exams, horizontals, and/or other larger scale supervisory-related events, a slightly different notification process may be utilized for efficiency while maintaining awareness of key parties and ensuring the sensitivity of conflict information.
- d. As part of the annual financial disclosure process local Conflicts staff will review conflicts for all LISCC staff across all LISCC Banks.
  - i. If there are conflicts found, Local Conflicts staff are requested to notify LISCC Conflicts staff via the LISCC Conflicts email box and local Ethics teams to determine if employee can participate on the event.
- e. The LISCC HR Conflict Tracker SharePoint site will be used to document any conflict issues or concerns and outcomes.

### **Standard Operating Procedures**

The following procedures reference the "Conflicts of Interest Standards Applicable to the LISCC Supervisor Program" issued by the Supervision and Regulation Division LISCC Oversight Section.

#### **Section 1: Financial Interests**

LISCC staff members, their spouse, domestic partner, and/or minor child(ren) who own debt or equity interests in any financial institution or its affiliates, that do not meet any of the exceptions listed in the LISCC Conflicts Guidance, have a maximum of 90 days to divest that prohibited debt or equity interest. Divestiture must occur immediately if a prohibited interest is purchased in violation of Federal Reserve policy while the staff member is employed by the Board or a Reserve Bank. The staff member must recuse themselves from all assignments posing a conflict of interest until the prohibited security is divested.

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### Section 1.1 Investment Prohibitions and Divestiture Requirements

1. LISCC team members may not maintain investments in LISCC firms.
  - a. Any spouse, domestic partner and/or minor child investments that meet the criteria for exceptions will be reported on the team member's Form D and updated as necessary.
  - b. Any prohibited investments by the team member will require divestiture within 90 days.
    - vi. Local conflicts staff will notify LISCC conflicts staff of the investment, and the divestiture plans via email to the LISCC Conflicts mailbox immediately and prior to approval of the plan.
      1. LISCC Conflicts staff will review the plan and indicate agreement or concerns back to local staff within three business days.
      2. Local conflicts staff will approve or modify plan accordingly.
    - vii. A waiver will be filed by local conflicts staff to ensure that the prohibited investment is monitored appropriately.
    - viii. Local conflicts staff will re-issue the credential with restrictions that correspond to the waiver for the prohibited investment.
    - ix. The employee must immediately update their Form D in the COFI application when divestiture is complete and notify Local conflict staff.
    - x. Local conflicts staff will re-issue the credential with no restrictions.
    - xi. LISCC conflicts staff will perform a check at the 90-day mark to ensure that the divestiture took place and make a note in the LISCC system of record.
    - xii. If the divestiture does not take place and an approved extension of the waiver has not been made, the individual will not be permitted to participate in the LISCC Program.
  - c. Any LISCC team member with a waiver for divestiture in place will be recused from any work related to the firm during the waiver period.
    - i. If the divestiture exceeds the waiver period for any reason, the local conflicts staff should immediately notify LISCC conflicts staff via email to the LISCC Conflicts mailbox so that a plan can be discussed for next steps.

### Section 1.2 Recusal Requirements for Investments

When a staff member, or their spouse, domestic partner, and/or minor child(ren) is permitted to retain an otherwise prohibited institution or affiliate investment, the staff member will be barred from participating in any particular matter affecting the institution or its affiliates until they have divested from the prohibited investments.

If a staff member, their spouse, domestic partner, and/or minor child(ren), own more than \$50,000 of shares in a mutual fund or exchange traded fund (ETF) with a stated objective of concentrating its investments in an industry, business, single country other than the United States, or bonds of a single state within the United States, the staff member must be disqualified from participating in any particular matter directly affecting one or more investments of the fund (if the affected investment is within the sector in which the fund concentrates).

1. On an annual basis and as determined necessary, LISCC Conflicts staff will review the aggregate value of any otherwise prohibited investments or assets.
  - a. All applicable individuals will be identified based on their current Form D disclosures.

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- b. LISCC conflicts staff will ask the identified individuals to report the latest shareholder value of their assets.
  - c. If the value of the assets is over the aggregate allowable limits, LISCC conflicts will notify the individual, their program management and local conflicts staff.
  - d. A discussion involving program leadership, LISCC and local conflicts staff will be had regarding their ability to participate in the LISCC Program. Recommendations will be made back to their local entity.
  - e. All information and decisions will be documented in the LISCC Program Conflict Tracker SharePoint site.
2. As they are identified, local conflicts staff will monitor any investments that exceed the thresholds established in guidance.
- a. If an investment exceeds this amount, local conflicts staff will alert LISCC conflicts staff.
  - b. The individual will not be permitted to participate in any LISCC event that may directly affect one or more of these investments.
  - c. LISCC conflicts staff will notify LISCC Program leadership of the conflict and document the situation in the LISCC system of record.

### Section 1.3 Additional Investment Recusal for Policy Matter and Horizontal Reviews

#### *Recusal Requirements for Matters of General Applicability*

Staff shall not participate in certain matters of general applicability, such as rulemaking and policy matters affecting the institution(s) directly or as part of a discrete class of institutions, if the staff member has debt or equity interests in a financial institution(s) over a certain dollar value, unless an exception applies, or a written waiver has been granted. For purposes of applying this rule, the value of any publicly traded securities owned is the aggregate of securities owned by the staff member, their spouse, and/or their minor child(ren), and the market value of the publicly traded securities **cannot exceed**:

- a. \$25,000 in any one such institution; or
- b. \$50,000 in all affected institutions.

If the securities are not publicly traded, such as in the case of foreign stock that is not listed on a U.S. national exchange, recusal is required from particular matters of general applicability, as well as particular matters specifically related to the institution, regardless of the value of the securities.<sup>17</sup> Additionally, stock options, warrants, restricted stock units (RSUs), stock appreciation rights, or phantom stock are not eligible for exemptions under federal ethics regulations. Therefore, if a staff member, their spouse, and/or their minor child(ren) own one or more of these equity-related interests, the staff member must be recused from matters of general applicability and particular matters related to the institution, regardless of the value of the interest.

#### *Recusal Requirements for Matters Involving Specific Parties*

Staff participating in horizontal reviews of LISCC firms and other particular matters involving specific parties **must** confirm that the aggregate value of publicly traded securities owned in any affected LISCC firms is below \$15,000.<sup>18</sup> For purposes of applying this rule, the value of any publicly traded securities owned is the aggregate of all securities owned by the staff member, the staff member's spouse, and

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minor child(ren). Dedicated Supervisory Team (DST) Members with stock over the prescribed thresholds cannot participate in horizontal assignments; however, the DST member may still participate in work of their assigned firm as long as they do not own stock in that firm.

1. Any LISCC team member with existing investments or assets in LISCC firms or firms involved in other LISCC horizontal examinations, must meet the criteria listed above for allowance and have a waiver and recusal in place for the specific firms.
2. On an annual basis and as determined necessary, LISCC Conflicts staff will review the aggregate value of any of these investments or assets.
  - a. All applicable individuals will be identified based on their current Form D disclosures.
  - b. Identified individuals will be asked to report the latest shareholder value of their assets.
  - c. If over the aggregate allowable limits, LISCC conflicts will notify the individual, their program management and local conflicts staff.
  - d. A discussion about their ability to participate in the LISCC Program will be had and recommendations will be made back to their local entity.
  - e. All information and decisions will be documented in the LISCC Program Conflict Tracker SharePoint site and noted explicitly in the System COFI Application.

### Section 2: Other Financial Interests

Most insurance products (policies, annuities, or loans against a policy) generally do not require staff to be disqualified from participating in matters involving the insurance company unless the matter directly affects the financial soundness of the company. Staff who own variable annuities or variable life insurance policies whose value depends on the performance of specified underlying assets may not participate in matters that would directly affect the value of those underlying assets, unless an exemption applies.

Staff engaged in supervisory activities may also continue to participate in a defined benefit pension or retirement plan obtained through prior employment at a financial institution or its affiliates. However, the staff member must be disqualified from participating in a particular matter involving that institution or its affiliates if the matter could affect the firm's ability or willingness to meet its pension obligation. The determination of whether a matter could affect a firm's ability or willingness is made on a case-by-case basis but could include decisions made during a financial crisis and/or when an institution is in danger of failing. Regular, ongoing recovery and resolution work or other supervision work conducted when the institution is in good financial condition will generally not prompt this analysis of solvency.

#### Section 2.1: Other Financial Interests

1. LISCC Conflicts staff will stay abreast of the LISCC financial institutions' conditions through monitoring OC meeting agendas for rating downgrade discussions.
2. Once a LISCC firm is downgraded to D2, LISCC conflicts staff will begin to identify LISCC team members' insurance products, policies, annuities, loans against a policy, etc. and recuse them from any work involving the specific LISCC firm.
3. LISCC Conflicts staff will notify the team members, LISCC Program leadership, and Local Conflicts staff of any required recusal(s).

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### Section 3: Borrowing

#### Section 3.1 Borrowing Prohibitions

1. Staff members are not permitted to borrow from a LISCC firm with the exceptions of credit cards, overdraft protection line, or a loan against a cash value of an insurance policy.
  - a. If a staff member has pre-existing debt with a LISCC firm, this will be reviewed by LISCC Conflicts staff and they may be asked to rectify the impermissible debt, to maintain their role within the LISCC Program.
    - i. A waiver and recusal will be in place during this time, until divesture. If applicable, a credential will be re-issued by local conflicts staff to reflect the restriction.
    - ii. Staff will have 90 days to rectify the impermissible borrowing.
    - iii. Staff must update their Form D once they have divested and submit for approval from local conflicts staff.
    - iv. Local conflicts staff will notify LISCC Conflicts staff once they received the alert from the COFI application.
    - v. LISCC Conflicts staff will use the COFI application and the Conflict Tracker SharePoint site to monitor, and check back within the 90-day timeframe, to ensure divesture was completed.
  - b. If Staff do have a borrowing with a LISCC firm, LISCC Conflicts staff, along with input from the local ethics team, will review the conflict, along any with pre-existing debt, and outline next steps.
2. Mortgages on primary residences and credit cards are permitted; however, no leadership position within LISCC will be permitted to hold a borrowing for a non-primary mortgage with **any** LISCC firm.
  - a. LISCC leadership positions include the S&R Division Director, Supervision Group Deputy Director, LISCC OC Chair, portfolio program SC Co-Chairs, PLG members, and Horizontal Team Leads (HTL).
  - b. If an employee is selected for a leadership role, but has an impermissible borrowing, they will be required to resolve this conflict using the process described above, including the 180 day refinance period to rectify.
3. The LISCC system of record will be used to document and track any abovementioned issues of concern for staff and additional notes may be added to the COFI application regarding these situations.

#### Section 3.2 Borrowing Recusal Requirements for Examiners

1. Examiners are required to follow local Reserve Bank conflicts procedures in acquiring a recusal for a LISCC firm for which they have a borrowing.
  - a. If their spouse/domestic partner or dependent child owns the borrowing, they will only be permissible for the reasons prescribed in the Standards and a recusal will be required for the LISCC staff member.
  - b. Local Conflicts staff will ensure that the Form D is updated and reflects the appropriate recusals in the COFI application.

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2. LISCC Conflicts staff will use the 'Recusal Standard Template' (see toolbox), to outline what responsibilities a staff member may or may not perform, under the guidelines of the recusal. Specific recusal activities for the role will be added as needed.

### Section 3.3 Borrowing Recusal Requirements for Non-Examiners

1. If a staff member has a conflict with a LISCC Bank, but is not an examiner, they must still have a recusal in place and the information uploaded on their Form D.
  - a. During annual attestation, Local Conflicts staff will verify if the recusal is still required.
2. LISCC Conflicts staff will note any special circumstances for non-examiners and track those recusals if necessary.

## Section 4: Relationships

### Section 4.1 Prior Employment with a LISCC Firm

***For LISCC, a serious candidate is defined as an individual who reaches the pre-hire conflicts check stage of the employer.***

1. Once a candidate has been identified as a serious candidate, whether being hired internally or externally, the pre-hire process is initiated by conducting the pre-hire conflicts review and posting the resulting Action Plan to the pre-hire site.
  - a. Local Conflicts uploads Action Plan to the SharePoint site and notifies the LISCC Conflicts staff of any conflicts with LISCC firms.
  - b. LISCC Conflicts staff will review the candidate's conflict and make recommendations on remediating any issues, if needed.
2. If recusals or waivers are explored, local conflicts staff will share the information with LISCC Conflicts to discuss particulars and make final decisions. Local conflicts staff should send an email to the Sys LISCC COFI mailbox and a brief meeting will be set to discuss.
3. Local Reserve Bank managers are notified when new hires have completed their conflicts documents; and if there has been prior employment with a LISCC firm.
  - a. The Local Manager should contact LISCC Program Manager of these staff regarding any LISCC firm conflicts.
4. LISCC conflicts will conduct semi-annual checks with Local Conflicts contacts to ensure accuracy.
  - a. Local Reserve Banks are responsible for communication to the employee requesting the waiver and will contact LISCC Conflicts when a waiver has been granted.
  - b. At the end of the waiver period, LISCC Conflicts will check with RB to validate eligibility of employee and remove any restrictions as necessary.
  - c. LISCC Conflicts will ensure that LISCC Program management is made aware of the expiration of the restriction.
5. LISCC Conflicts will keep track of employees with prior employment, run reports and update the system of record semi-annually.

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### Section 4.2 Employment with a Family Member by a LISCC Firm

1. Staff members are responsible for reporting family member current employment or their seeking of employment with LISCC firms through local processes by updating staff Form D and notifying local conflicts staff when this situation arises.
2. Local Conflicts staff will notify LISCC Conflicts staff of such changes. LISCC Conflicts staff will review the role of the family member and request more detailed information from the employee, if the role is such that would be a conflict for LISCC staff. Some roles may be allowable, as they wouldn't interact with any supervision activities; LISCC Conflicts staff and local Conflicts staff will review on a case-by-case basis, to determine outcome.
  - a. If the notification is about a family member seeking employment with a LISCC firm, LISCC conflicts staff will contact the LISCC Program team member to explain the potential outcomes and impacts should their family member accept employment with the LISCC firm.
3. If a recusal or waiver is explored, local conflicts staff will review with local Ethics and consult with LISCC conflicts staff of the appropriate outcomes. If there is uncertainty, this will be handled on a case-by-case basis. Specific notes will be made into the COFI application.
4. LISCC conflicts staff will log these decisions into the LISCC system of record and note any special circumstances around family members.
  - a. LISCC conflicts staff will inform LISCC leadership of the decisions.
5. In conjunction with 4.1, LISCC conflicts staff will review the data quarterly to ensure quality control and update system of record accordingly.

### Section 5: Waivers

1. Staff members will request waivers by completing the appropriate form for the situation as listed above. This waiver must be submitted via their local employer's process and submitted to their local Conflicts staff and management as appropriate.
2. Local conflicts staff will alert LISCC Conflicts staff of any waivers via email to the LISCC Conflicts mailbox immediately and prior to approval.
3. LISCC Conflicts staff will review the waiver in partnership with local Conflicts staff and review the position of the employee within the LISCC Program. LISCC Conflicts staff will confer with LISCC Program leadership over the specific area in which the individual works; and LISCC COO will review waiver request and confirm with LISCC leadership.
  - a. Details of the conflict will be kept confidential and not shared with LISCC leadership.
  - b. Discussion will determine if a waiver is feasible and workable for the individual's position within the LISCC Program.
    - i. DST program participants may work with waivers for firms outside of the specific supervisory team for which they are assigned.
    - ii. Horizontal program participants will be carefully considered to assess the impact of the waiver upon one's ability to perform job responsibilities within the LISCC Program.
  - c. A recommendation regarding the waiver will be made and submitted back to the local Conflicts staff, and a final decision will be made collaboratively.
  - d. Local Reserve Bank conflict staff are responsible for submitting the waiver to the Board of Governors for approval.

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- e. Local Conflicts staff will contact LISCC Conflicts when a waiver has been granted or denied by the Board of Governors.
- f. Local conflicts staff are responsible for communicating outcomes to the employee requesting the waiver while LISCC Conflicts will inform the LISCC Program leadership of this information.
- 4. Approved waivers will be noted in the LISCC Program conflicts system of record as well as in the COFI application.
  - a. LISCC Conflicts will conduct quarterly checks regarding any waivers with Local Conflicts contacts to ensure accuracy.
  - b. After 1 year or at the end of the waiver period (if less than 12 months), LISCC Conflicts will work with the Board, and Local conflicts staff to validate eligibility of employee and remove any restrictions as necessary or if any additional time is required to avoid the appearance of a conflict.
  - c. LISCC Conflicts will ensure that LISCC Program management is made aware of the expiration of the restriction.

### Section 6: Pre-hire Conflicts of Interest

*For LISCC, a serious candidate is defined as an individual who reaches the pre-hire conflicts check stage of the employer.*

- 1. When a Reserve Bank or the Board completes its pre-hire conflicts check, using the LISCC COFI mailbox they will notify the LISCC Conflicts staff of the candidate's status and share the action plan with the LISCC Conflicts staff when it has been created.
- 2. If a Reserve Bank or the Board decides to assign an existing staff member into the LISCC Program, even on a partially allocated basis, they will instruct the individual to update their Form D and review this information prior to the assignment. Any conflicts with LISCC firms in this change will be shared with the LISCC Conflicts staff by local Conflicts staff.
- 3. LISCC conflicts staff will log the entry into the system of record and note any concerns which will be communicated back to the local conflicts staff within three business days.
- 4. On a quarterly basis, LISCC Conflicts staff will perform a review to ensure that all incoming LISCC team members were accounted for and that appropriate pre-hire conflicts were identified and/or addressed.
  - a. Using the LISCC On/Offboarding roster, any team members added within the previous quarter will be identified.
  - b. The LISCC system of record will be used to ensure that appropriate pre-hire reviews were performed, and if any conflicts were addressed.
  - c. Any identified issues will be immediately addressed with the appropriate parties which may include the employer, LISCC Program leadership, and LISCC Oversight, as needed.

### Section 7: Onboarding

- 1. Once an individual has been hired for an intended LISCC Program role (fully or partially allocated), the hiring entity will provide their typical interactive ethics training to that individual within 30 days.
  - a. Within three business days of the training completion, Reserve Bank/Board staff will notify LISCC Conflicts staff.

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- b. LISCC Conflicts staff will record the employer-based onboarding in the system of record.
  - c. Existing staff members may be handled differently (see 3 below)
2. Through the onboarding process a new staff member will be informed of the need to complete the LISCC Conflicts of Interest training within 30 days of being notified of the requirement.
3. If the Reserve Bank or Board decides to assign (through hiring, restructuring or reassignment) an existing staff member to the LISCC Program and their annual ethics training is current according to employer practices that individual is only required to participate in LISCC Onboarding training and associated conflicts training as described in step 2.
  - a. This aspect of onboarding will take place within the first 30 days of the LISCC assignment.
4. On a quarterly basis, LISCC Conflicts staff will perform a review to ensure that all new LISCC team members LISCC Conflict trainings is accounted for and that onboarding occurred.

### Section 7.1: Annual Training

1. Employees will complete annual ethics training with their local Reserve Bank; *In addition*, LISCC Conflicts will add specific COFI training annually for LISCC staff to complete. LISCC Conflicts will require LISCC staff to complete both trainings annually.
2. LISCC Conflicts will check quarterly with local Reserve Banks conflicts that staff have completed their training during the annual period.
  - a. If training is not completed within a timely manner, LISCC Conflicts staff will notify local and program managers.
3. FedLearn assigns annual training to local staff and can track completion of training.
  - a. Reserve Bank/Board Conflicts contacts will share a list of confirmed training annually.
  - b. LISCC Conflicts staff will maintain the list and periodically review within the system of record.

## Section 8: Annual Financial Disclosures

1. All LISCC Program participants are expected to complete the appropriate financial disclosure forms for their role in the LISCC Program and their employer requirements. This will be conducted annually according to employer established timelines.
2. Quarterly, LISCC Conflicts staff will perform a review to ensure that all current LISCC Program team members have filed their employer appropriate annual financial disclosure documentation.
  - a. Using the LISCC roster, any current team members will be identified.
  - b. The system of record will be used to ensure that appropriate documentation is available within the past 12-month period and any conflicts were addressed/resolved.
  - c. Any identified issues or missing information will be immediately addressed with the appropriate parties which may include the employer, LISCC Program leadership, and LISCC Oversight, as needed.
  - d. If any conflicts are identified by LISCC Conflicts staff, they will immediately inform the local Conflicts staff along with the program and local management to ensure that they do not participate on any supervisory activities for institutions with which the conflict exists.
    - i. Following discussion with the employer Conflicts staff/legal, LISCC Program leadership, Board legal and LISCC Oversight as needed, a plan and timeline will be determined to address the specific issue.

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3. The LISCC Conflict Tracker SharePoint site will be used to document any conflict issues or concerns and outcomes of LISCC Conflict staff inquiries and appropriate notes will be added to the COFI application.

### Section 9: Participation in Supervisory Activities

1. Scheduling staff will use conflict information from OASiS, imported from the COFI application, to determine if staff are eligible to participate in supervisory events.
  - a. LISCC staff are expected to notify their LISCC Program Manager if they are scheduled on an exam that involves an institution with which they have conflicts, **prior** to commencement of the supervisory event.
  - b. When a LISCC staff member is flagged as having a conflict on a scheduled exam, schedulers will reach out to the LISCC COFI team via the group mailbox.
  - c. LISCC COFI Team will review the conflict and, with input from the local ethics team, if needed, and provide a determination on whether the LISCC staff member can participate on the exam.
2. As part of the annual financial disclosure process local Conflicts staff will review conflicts for all LISCC staff across all LISCC Banks.
  - a. If there are conflicts found, Local Conflicts staff are requested notify LISCC Conflicts staff via the LISCC Conflicts email box and local Ethics teams to determine if employee can participate on the event.
3. The LISCC HR Conflict Tracker SharePoint site will be used to document any conflict issues or concerns and outcomes of LISCC Conflict staff inquiries.

### Section 10: Seeking Employment with a LISCC Firm

#### *Exploration of Job Opportunities*

1. Staff members seeking employment at a LISCC firm must immediately notify their employer's conflict staff and LISCC Program conflicts staff and suspend all work involving the firm(s).
  - a. Seeking employment will be seen as any of the conditions listed with the Standards for Conflicts of Employment for the LISCC Program.
  - b. In contacting both Local and LISCC Program Conflicts staff, employee will share the name of the firm or firms where they are seeking employment and date of when the process began.
  - c. Conflicts staff will inform the employee that they are ultimately responsible for managing their conflicts of interest and must recuse themselves from any work involving the firm.
2. Employee must update their Form D within the Cofl application.
  - a. Employee will add a new conflict under Other Situations and include the name of the institution along with a note that this is a seeking employment situation.
3. LISCC Conflicts staff will inform the LISCC portfolio Program Manager and Operations Lead that a conflict exists and reinforce that the employee must be recused from any work involving the firm.
  - a. LISCC Conflicts staff will use caution to not reveal that the employee is seeking employment but be clear that a conflict does exist.

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- b. LISCC Conflicts staff will outline that the employee must not perform any substantive work related to the firm including participation on any examinations, inspections, or analyses during this time.
  - c. Any specific work plans or questions will be discussed at this time to clarify work that can/cannot be performed.
4. If the employee concludes the exploration of opportunities without progressing into employment negotiations, they should update their Form D to deactivate the conflict and inform both employer's conflict staff and LISCC Program conflicts staff of this update.
  - a. LISCC conflicts staff will inform the LISCC portfolio Program Manager and Operations Lead that the conflict no longer exists and when regular work activities may be resumed.

### *Employment Negotiations*

1. Once an employee is scheduled for an employment interview with a LISCC firm, the employee is considered to be in employment negotiations, and the employee should immediately cease any substantive supervisory work activity within the entire LISCC portfolio and contact LISCC Program Conflicts staff.
  - a. Employee will be asked to keep LISCC Conflicts apprised if they decide to withdraw from the employment negotiation and what to do if they accept a role with a LISCC firm (outlined in Section 11- Responsibilities When Departing for an External Employer).
2. LISCC Conflicts staff will contact the LISCC portfolio program leadership (Program Co-Chairs, Operations Lead and Program Manager) and share the new restrictions for all LISCC firms.
  - a. LISCC Program leadership and LISCC conflicts will discuss the specific types of work that may be performed during this time and restrictions that must be upheld.
  - b. LISCC Conflicts will clarify that the restriction does not include barring the staff member from accessing confidential supervisory information (CSI)
  - c. LISCC Program leadership will determine what non-supervisory work the individual may perform during the employment negotiation phase and communicate this to the staff member.
3. If the negotiation phase extends past the time when the LISCC Program can provide permissible or non-supervisory work, LISCC conflicts staff will confer with both the local employer's conflicts staff and the local Human Resources Business Partner to determine if temporarily assigning the individual outside of the LISCC Program would be beneficial and efficient.
  - a. Local Conflicts and/or local Human Resources will work with local Supervision Leadership to determine if a temporary assignment outside of the LISCC Program is feasible and appropriate.
  - b. Local Supervision Leadership, in partnership with LISCC Leadership will communicate a decision to temporarily reassign the individual to non-LISCC work.
4. If the staff member is no longer seeking employment according to the above definition from the LISCC Conflicts Standards, they must update their Form D to reflect this change and inform both the local and LISCC Program conflicts staff of this change.
  - a. LISCC conflicts staff will inform the LISCC portfolio Program Manager and Operations Lead that the conflict no longer exists and that regular work activities may be resumed.

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- b. If the team member has engaged in non-LISCC Program work during the negotiation period, local Supervision and LISCC leadership will discuss the transition back to LISCC work and agree to a timeline for this to occur.
  - i. Local Supervision and/or LISCC Leadership will inform the individual of this information.

### **Section 11: Responsibilities When Departing for an External Employer**

1. Once LISCC conflicts are made aware of an individual receiving or accepting an offer of employment with a LISCC firm, they will verify that local management and Program management the departure date and inform the employee that they are ultimately responsible for managing their conflicts and must recuse themselves from any work involving the firm.
  - a. Local Management are instructed to immediately fill out the staffing change form, which is automatically sent to Technology and Reporting, LISCC Offboarding, and the QA team.
  - b. LISCC Technology and Reporting team will receive a staffing change form once the local manager submits this information.
    - i. The staffing change form edits are updated in the LISCC roster and automatically refreshed overnight to update across the system.
    - ii. Roster change alerts go to LISCC QA. LISCC Human Resources/Conflicts and LISCC operation Leads and District security contacts.
  - c. LISCC Operations Leads are responsible for submitting LISCC NAMS access removal requests as soon as they are made aware that an individual is departing.
    - i. Technology and Reporting staff monitor LISCC AD access monthly and verify with local managers that their access have been updated to reflect a new role; or removed if they left the Bank.
    - ii. Technology and Reporting staff send a monthly email about C-SCAPE and Y-14 access to local managers and District security contacts, to verify those individuals that have left the LISCC Program, have had their access updated to reflect their new role and the changes.
2. For staff departing to work at a LISCC firm, LISCC HR will defer to LISCC QA and their embedded process which determines the post-employment restrictions for staff once they depart.
3. Tracking information for individuals leaving the program is monitored by LISCC Offboarding after receiving information from Technology and Reporting staff.

### **Section 12: Post-Employment Requirements and Restrictions**

1. LISCC QA is responsible for conducting all post-employment and workpaper reviews for LISCC staff and any questions should be addressed to their team.

### **Section 13: Credentials (from the Federal Reserve Administrative Manual 5-040)**

1. All LISCC Program staff participating in examinations of any type must qualify to be issued a credential according to the Standards for Obtaining Examiner Credentials (April 2015).
2. Credentials will be requested through the local Reserve Bank of the LISCC team member.
3. LISCC Conflicts staff conduct annual checks to ensure that all eligible staff have active credentials.

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- a. LISCC Conflicts staff will verify the credential status of all examiners during the annual LISCC Conflicts Review.
- b. If a credential is missing, LISCC Conflicts will bring this to the attention of the Local Conflicts staff and LISCC Program leadership.

### ***Terminology for Conflicts Procedures***

***FRAM:*** Federal Reserve Administrative Manual

***Serious Candidate:*** For the LISCC Program, this is as an individual who reaches the pre-hire conflicts check stage of the employer.

***Employer:*** The entity (Board or Reserve Bank) that employs the individual staff member assigned to a LISCC role.

***System of Record:*** For LISCC Procedures, the system of record references the LISCC documents that will record any LISCC-specific conflicts of interest and will maintain records of any areas mentioned in these procedures. At present, it will be located within a secure SharePoint site with highly limited access.

***LISCC conflicts staff:*** The LISCC Conflicts staff resides within the LISCC Office of the OC Human Resources Team. There will be a primary designee and secondary designee for these responsibilities. Currently, this is **[Redacted: name]** and **[Redacted: name]**.

***Local Manager:*** Within the LISCC Program, the Local Manager references the individual who has primary responsibility for the individual at the local employing entity and has a reporting relationship within the Workday tool.

***Program Manager:*** Within the LISCC Program, the Program Manager references the individual who has day-to-day functional supervision over a team member's work. This individual may involve a cross-district reporting relationship or be included in the matrixed team within the Workday tool, however, this will apply to Reserve Bank team members only (Board team members are not included in Workday).

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### Section VI: Access Management

The LISCC Supervisory program has adopted the access management guidance as set forth on the LISCC Access page (LISCC SharePoint site -> gray menu bar -> right side). The LISCC Access page provides an overview and guidance for staff describing (1) the Terms of Use Agreement and Access to Confidential Supervisory Information (CSI); (2) access to National Information Center (NIC) / National Examination Data (NED), Banking Organization National Desktop (BOND), and Central Document and Text Repository (CDTR); (3) access to LISCC SharePoint and ExamSpace via Active Directory (AD) Groups; (4) access to the Consolidated Supervision Comparative Analysis, Planning, and Execution (C-SCAPE) database; and (5) access OCC documents through eDocs.

Contact the relevant portfolio program Operations Lead or Coordinator if you have questions about access.

### Section VII: Records Management

The LISCC Supervisory Program has adopted the formal records management guidance set forth in AD 18-9/CA Admin letter 18-9, *"The Management of Supervisory Documents and Data by Reserve Banks"* (**[Redacted: hyperlink to internal website to which the AD letter is posted]**). AD 18-9/CA Admin letter 18-9 and the new records manual, *"Reserve Bank Supervision and Regulation Recordkeeping Manual"* (hereafter referred to as the Manual), provides supplemental guidance for S&R staff on AD letter 15-9/CA Admin letter 15-3 *"Requirements for Federal Reserve Banks' Records Management Programs"* (**[Redacted: hyperlink to internal website to which the AD letter is posted]**). S&R staff are responsible for ensuring that supervisory activities are properly documented by filing substantive documents or electronic messages (for example, e-mail, instant messages, or text messages) related to that activity in the appropriate electronic recordkeeping system as described in the Manual.

### Section VIII: Information Security (Including Breach Protocol)

#### Information Security and Data Handling

Information security is highly important in the Federal Reserve System and among supervisory staff. Improper data handling could lead to the inappropriate disclosure of confidential supervisory information, negative impact on our firms, and reputational risk to the FRS. **All supervisory team staff members are required to familiarize themselves with policies and procedures for Information Security**, in particular those associated with Information Classification & Handling and Data Loss Protection (DLP).

#### Handling of Confidential Information

All employees are required to follow certain procedures when handling confidential information (including CSI). It is critically important that you are aware of the level of sensitivity of the information you are working with, and that you must handle and classify the information according to requirements.

Much of the material that LISCC team members work with on a daily basis is required to be labeled either "Internal FR" or "Restricted FR." **It is every individual's responsibility to correctly assign classification labels to all documents and following the related handling protocol. Managers are accountable** for ensuring their staff comply with the Data Handling Information.

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You must **IMMEDIATELY** report the loss of Confidential Supervisory Information, Personally Identifiable Information and Sensitive Personally Identifiable Information to the Supervision and Regulation Division Info Security Officer, working through your Local Incident Response Coordinator (LIRC). More detailed guidance can be found in the Operating Manual for Sharing CSI and in the LISCC Security Incident Management Procedure. Contacts for reporting a loss of CSI can be found here (see p.16 of the Security Incident Management Procedure). If you are unsure of the security implications or rules that pertain to the information you handle as part of your job responsibilities, always "err on the side of caution" and ask for guidance before taking any action. Questions pertaining to information security should be directed to Division Information Security Officer, LIRC, or any of the contacts listed on p.16 above. An email may also be sent to **[Redacted: email address]**.

### Breach of CSI

When a CSI breach is identified, the breach is investigated per the processes and procedures of the legal entity where the breach occurred. Because supervisory data is the property of the Board, once a breach is reported, the legal entity reporting the breach handles the investigation in concert with the Supervision and Regulation Division Information Security Officer, who interfaces with the Board's Information Security Group. There is a standard reporting mechanism and investigation protocol that is followed. Once the investigation is complete, there is a decision made about whether disclosure is required, after which the legal entity reporting the breach develops talking points for the communication originated.

### Data Loss Protection (DLP)

Data Loss Protection (DLP) technology reduces the risk of inadvertently disclosing classified or sensitive data, through monitoring, warning, and reporting on data transmissions to external destinations. When transmitting information via Outlook email, employees are expected to use the classification and data handling labels to categorize the information appropriately. The OCC, FDIC, and CFPB are known regulators so email may be transmitted to those agencies without receiving the DLP notice.

### External Parties in Meetings and Confidential Supervisory Information

In the event that firm management requests to have non-employees (e.g., consultants, external auditors, etc.) in meetings where regulators OR the firm are presenting CSI, supervisory teams must obtain explicit permission before conducting the meeting. This situation typically requires that an individual confidentiality agreement be executed and approved by the Board of Governors.

## Section IX: Business Tools and Technology

Content to be provided later.

## Section X: Supervisory Planning

The first key step of the annual supervisory process is completing the supervisory plan. The supervisory plan is owned by the LISCC OC and its completion is facilitated by the OOC. Details on the supervisory planning process can be found here.

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### Section XI: Annual Assessment

The LISCC Program Annual Assessment Policy (AA Policy, or the Policy) formally communicates the expectations, processes, standards, and workpaper requirements for the LISCC Program's annual supervisory ratings assessment of firms in the LISCC supervisory portfolio, in accordance with US Code Title 12<sup>20</sup>G and Federal Reserve System (Federal Reserve, System, FRS, or FR) guidance as set forth in Administrative (AD) Letter 19-5, Framework for Assessing Oversight of the LISCC Supervisory Program and other Board guidance as appropriate.

The AA Policy outlines controls and accountability mechanisms given the LISCC Supervisory Program's governance structure to support the determination of Large Financial Institution (LFI) ratings in accordance with SR Letter 19-3, Large Financial Institution (LFI) Rating System, as well as non-LFI ratings, in each case integrated with and sustained by the core functionality and program/business guidance associated with the System's common examination platform, One Agile Supervision Solution (OASIS).

The Policy covers (a) proposing and vetting LFI and non-LFI supervisory ratings; (b) drafting, editing, and reviewing "annual assessment letters" that communicate the assigned ratings and the associated rationale, and their distribution to LISCC firms; (c) providing consolidated enforcement action updates to the Operating Committee (OC) and to the firms, where relevant; (d) LISCC Program interaction with the Consumer Financial Protection Bureau (CFPB); and (e) oversight and controls for each of these areas (including roles and responsibilities, workpaper requirements, divergent views, approval process, and quality control (QC)).

The AA Policy will be reviewed, at least annually, to ensure that the expectations, processes, standards, and workpaper requirements continue to be relevant and are reflective of any newly issued System and internal guidance. The LISCC Program COO within the OOC, or a designee, will approve any substantive changes or updates to the Policy.

To supplement the AA Policy, additional instructional and procedural information can be found in various templates and other documentation that are located on the AA Documents Guidance Library (by Year) SharePoint site, OASIS, and in the following LISCC Program guidance: LISCC Program Operating Manual, Enforcement Actions Operating Manual, and/or the RRP Title I Processes and Protocols. All confidential supervisory information (CSI) must be stored in OASIS per AD 23-2, Implementation of One Agile Supervision Solution (OASIS), and per AD 18-9, The Management of Supervisory Documents and Data by Reserve Banks.

In addition, more tactical and execution-related information can be found in the LISCC Annual Assessment Tactical Information Package (AA TIP) for that year (formerly called the Annual Assessment Consolidated Information Package, or AA CIP). To locate the most recent AA TIP, please refer to the LISCC SharePoint site and select the Supervisory Program Lifecycle "tile" followed by Annual Integrated Assessments by Year. Locate the most recent year AA TIP in the Guidance Documents section.

2024 AA TIP

2023 AA TIP

2022 AA CIP

2021 AA CIP

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<sup>20</sup> These activities are conducted pursuant the Board's authority to examine holding companies. See 12 U.S.C. § 1844 (c)(2) and 12 U.S.C. § 1467a (b)(4).

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### **APPENDIX A – LISCC Program Common Policies**

For a description of the overall policy applicable to any of the topics listed, please click on the item:

LISCC Program Operating Manual

AD 19-05, "Framework for Assessing Oversight of LISCC Supervisory Program"

LISCC Program Annual Assessment Policy

LISCC Program Sound Examination Principles

Enforcement Actions Operating Manual

BOND Requirements

Examination Workpapers Requirements for Participation on Other Agencies' Exams

Divergent Views Policy

Operating Manual for Sharing CSI

LISCC Security Incident Management Procedure

Records Management (Reserve Bank SR Recordkeeping Manual)

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### APPENDIX B – LISCC Program Acronyms

The following acronyms are used throughout LISCC Program, operating manuals, and tools/templates:

ALM	Asset and Liability Management
AML	Anti-Money Laundering
BCBS	The Basel Committee on Banking Supervision
BHC	Bank Holding Company
BSA	Bank Secrecy Act
CBEM	Commercial Bank Examination Manual
CCAR	Comprehensive Capital Assessment Review
CFP	Contingency Funding Planning
CLAR	Comprehensive Liquidity Assessment Review
CMG	Crisis Management Group
COG	Coordination and Oversight Group
CPU	Central Production Unit
CRA	Community Reinvestment Act
CSI	Confidential Supervisory Information
CSR	Committee on Supervision and Regulation
DCCA	Division of Consumer and Community Affairs
DFAST	Dodd Frank Act Stress Test
DST	Dedicated Supervisory Teams
EAC	Edge Act corporation
ECB SSM	European Central Bank Single Supervisory Mechanism
FBO	Foreign Banking Organization
FDIC	Federal Deposit Insurance Company
FHC	Financial Holding Company
FOMC	Federal Open Market Committee
FRS	Federal Reserve System
FSB	Financial Stability Board
G&C	Governance and Controls
HET	Horizontal Evaluation Teams
HTL	Horizontal Team Lead
ICOG	Information Collection Oversight Group
IRM/IC	Independent Risk Management and Internal Controls
LCR	Liquidity Coverage Ratio
LISCC	Large Institution Supervision Coordinating Committee
LOG	Letter Oversight Group
MAP	Monitoring and Analysis Program
MCAT	Model Coordination and Advisory Team
MCBL	Management of Core Business Lines
MOG	Model Oversight Group
MRA	Matters Requiring Attention

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<b>MRIA</b>	Matters Requiring Immediate Attention
<b>OC</b>	LISCC Operating Committee
<b>OCC</b>	Office of the Comptroller of the Currency
<b>OFAC</b>	Office of Foreign Assets Control
<b>PLG</b>	Program Leadership Group
<b>RRP</b>	Resolution and Recovery Program
<b>SC</b>	Steering Committee
<b>SDG</b>	Scenario Design Group
<b>SMB</b>	State Member Bank
<b>SMV</b>	Supervisory Model Validation Unit
<b>SNC</b>	Shared National Credit
<b>SR</b>	Supervision & Regulation
<b>SR Director</b>	Director of Supervision and Regulation at the Board of Governors
<b>SRP</b>	The Supervisory Assessment of Recovery and Resolution Preparedness
<b>SSTMGC</b>	Supervisory Stress Test Model Governance Committee
<b>UFIRS</b>	Uniform Financial Institutions Rating System

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### APPENDIX C – Meeting Summary Framework<sup>21</sup>

Below is additional information on meetings and expectations administered by the Corporate Secretariat (CS) team. Information and additional expectations about the LISCC governance bodies can be found in the public LISCC Program Manual and the internal LISCC Program Operating Manual. For handling of divergent views during the LISCC and OC-related meetings below, members often have differing views during discussions of supervisory outcomes. Given the nature of the discussions, thematic divergent views will be memorialized in meeting summaries produced. However, contrary to AD Letter 19-5, *Framework for Assessing Oversight of the LISCC Supervisory Program*, attribution to specific individuals will not be included in the meeting summaries. All LISCC and OC members are obligated to raise their views during the meetings. A comprehensive document record is not necessary unless the divergent view is memorialized in written communication to either the OC Chair or the OperatingCommitteeCOO mailbox. If the CS team is made aware of the conflict, the team will discuss with the OC Chair and memorialize the disposition of the divergent view in a memorandum. If related to a supervisory rating, the record will be added in a sensitive folder within the common examination platform (OASIS) event. For events that have concluded, the record will be stored on the LISCC SharePoint site in the Workspace – OC section. For post-employment reviews, the starting assumption is that OC and SC members have influence on supervisory ratings and firm exam assessments, in addition to DST Leads and their Deputies and Program Leadership Group (PLG) members. For some decisions, there may be programs and cases where the PLG and not the SC made decisions or influenced the supervisory outcomes, in addition to oversight by the applicable core program Co-Chair (who are also OC members). LISCC Quality Assurance (QA) conducts post-employment reviews and can clarify the at the start of the review.

For LISCC and OC-related meetings, the use of proxies is typically only permitted for LISCC meetings at the discretion of the LISCC Chair. LISCC members are asked to notify the OperatingCommitteeCOO mailbox in advance of any proxy attendees. The CS team will reach out to OOC Human Resources (HR) to perform a conflicts of interest check before the meeting and will notify the LISCC Chair of any proxy attendees and whether a conflict-of-interest check was performed and highlight any concerns given the current agenda. Additionally, readouts or meeting notes are not meant to reiterate content contained in presentations or meeting materials, rather they will summarize discussion topics. See additional information in the table below.

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<sup>21</sup> Prior procedures are located: LISCC/OC Meeting and Calendar Management Procedures.

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Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
LISCC (commit tee)	Updates from the Program; Advisory to Chair and OC Chair; Non- decision- making committee	<p>LISCC Members <b>[(Redacted: email address)]</b></p> <p>Program and DST Co-Chairs invited for planning then removed depending on agenda <b>[(Redacted: email address)]</b></p> <p>Presenters and others determined based on agenda</p>	Readout only when discussing supervisory planning (including MAP Navigator and areas of focus) process or supervisory ratings- related topics	When a readout is produced, agenda/ purpose, presentati on materials, and high- level discussion topics, Teams Chat summary, Divergent View summary, Decision summary.	1.5 weeks after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry review	<p>OC Committ ee Coordin ators Worksp ace -- MtgMin - ActionIt ems (frb.gov) or CS Team OneNot e files (LISCC Meeting Notes - OneNot e LSCG Group ( Web view))</p> <p>Backup meeting material</p>	LISCC Mem bers - - LISCC Mem bers Work space Home (frb.g ov)	No	Yes	<p>- LISCC Chair approves final agenda</p> <p>- Meeting frequency ranges from 4 to 8 meetings a year depending on Chair preference, usually two- hour meetings</p> <p>- Meetings typically follow core LISCC Program processes (e.g., supervisory planning, ratings/ AA)</p> <p>- Notes typically posted as Word document</p> <p>- See LISCC Public manual for membership highlights</p>

<sup>22</sup> AD Letter 19-5 defines timely dissemination of key decisions and action items as no later than 30 days after date of meeting. For accuracy, CS team staff are to provide notes well in advance. However, to balance workloads, at the discretion of the Corporate Secretary, expectations in this table may be adjusted with the goal of adhering to the 30-day expectation.

<sup>23</sup> The review and approval will be handled via email between the CS team members. There will be no other records to measure this expectation.

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Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
								s versions are someti mes shared on the CS Team Board shared drive				
OC Meeting s (In Person/ Hybrid)	Firm supervision updates from exams or monitoring from programs or DSTs. Policy or practice updates, or program guidance, oversight and strategy updates as determined needed by the OC Chair.	OC members <b>([Redacted: email address])</b>  Listen-only: DST Leads and Deputies <b>([Redacted: email address]);</b>  program PLGs <b>([Redacted: email address])</b>  LISCC Oversight Section (LOS) and Quality Assurance (QA) Managers (except for executive sessions)  Presenters and others determined based on agenda	Meeting Note Template  AA and Interim Ratings Changes notes use the OASIS Meeting Note Functionali ty	Agenda/ Purpose Linked Presentati on Materials High-Level Discussion Topics Teams Chat Summary Divergent View Summary Decision Summary	2 weeks after meeti ng  AA, Interi m Rating s Chang es meeti ng may requir e 1 week after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry Review	OC Committ ee Coordin ators Worksp ace -- MtgMin - ActionIt ems (frb.gov)  Backup meeting material versions are someti mes shared on the CS Team	OC Mem bers - - OC Work space Home (frb.g ov)	Yes  Typically, at least one program or DST Co-Chair <u>or</u> 65 percent of member s	No	- Referred to as “Quarterly” meetings because typically held four times a year for 2 days - February meeting for ratings Annual Assessment Discussion, including a separate executive session. - December meeting includes Program workforce planning and strategy sessions - OC Chair approves agendas - If meeting summary template used, posted as Word document

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Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
					Imme diately after AA, AA execut ive sessio n, or OC interi m ratings discus sion, DSTs are emaile d final ratings decisi ons and emaile d retain ed in OASIS event			Board shared drive  For planning , CS Team OneNot e used (OC Meeting Notes - OneNot e LSCG Group ( Web view))				
OC/Co- Chair Calls	Firm supervision updates.	OC Chair and program/DST Co-Chairs All OC members invited <b><i>([Redacted: email address])</i></b>	Readout	Agenda Items/Pur pose, Presentati on Materials	2 to 3 days after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta	For planning and draft readout s, CS	OC Mem bers - - OC Work space	Yes  Typically, at least one program	No	- Biweekly - One-hour meetings - Generally, readouts are shared via email with OC members and stored in

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Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
		Presenters and others determined based on agenda		High-Level Discussion Topics Teams Chat Summary Divergent View Summary Decision Summary			ry Review	Team OneNot e Files (Co- Chair- OC Call Meeting Notes - OneNot e LSCG Group ( Web view))  Backup meeting material versions are someti mes shared on the CS Team Board shared drive	Home (frb.g ov)	or DST Co-Chair <b>or 55</b> percent of member s		their native form (e.g., msg)
OC Meeting Supervis ory Plan Midyear Refresh	Discuss potential changes to supervisory strategy and plans, and may include	OC members ( <b>[Redacted: email address]</b> )  Listen-only: DST Leads and Deputies	Meeting Note Template	Agenda Items/Pur pose, Presentati on Materials	1 week after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry Review	OC Committ ee Coordin ators Worksp ace --	OC Mem bers - - OC Work space Home	Yes  Typically, at least one program or DST	No	- Typically, one meeting and a separate executive session - May be scheduled as part of a “Quarterly” OC meeting

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Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
	revisit of supervisory priorities/area s of focus	<p><b>(<i>[Redacted: email address]</i>);</b></p> <p>program PLGs <b>(<i>[Redacted: email address]</i>)</b></p> <p>LISCC Oversight Section (LOS) and Quality Assurance (QA) Managers (except for executive sessions)</p> <p>Presenters and others determined based on agenda</p>		High-Level Discussion Topics Teams Chat Summary Divergent View Summary Decision Summary				MtgMin - ActionIt ems (frb.gov)	(frb.g ov)	Co-Chair <b>or</b> 65 percent of member s		
OC Meeting Supervis ory Plan Discussi on	Discuss following year supervisory strategy and plans	<p>OC members <b>(<i>[Redacted: email address]</i>)</b></p> <p>Listen-only: DST Leads and Deputies <b>(<i>[Redacted: email address]</i>);</b></p> <p>program PLGs <b>(<i>[Redacted: email address]</i>)</b></p>	Meeting Note Template	Agenda Items/Pur pose, Presentati on Materials High-Level Discussion Topics Teams Chat Summary Divergent View Summary	1 week after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry Review	OC Committ ee Coordin ators Worksp ace -- MtgMin - ActionIt ems (frb.gov)	OC Mem bers - - OC Work space Home (frb.g ov)	Yes  Typically, at least one program or DST Co-Chair <b>or</b> 65 percent of member s	No	- Typically, one meeting and a separate executive session - May be scheduled as part of a “Quarterly” OC meeting

## OOC Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
		<p>LISCC Oversight Section (LOS) and Quality Assurance (QA) Managers (except for executive sessions)</p> <p>Presenters and others determined based on agenda</p>		Decision Summary				material versions are sometimes shared on the CS Team Board shared drive				
Monthly Vice Chair of Supervision Meetings	Updates from the Program	<p>OC Chair</p> <p>Program and DST Co-Chairs and DST Leads and Deputies invited for planning then removed depending on agenda (<i>[Redacted: email address]</i>)</p> <p>Presenters and others determined based on agenda</p>	None	None	None	None	None	For planning, CS Team OneNote Files (LISCC VCS Briefings - Potential Topics (Web view))	Presentation Materials Stored: <i>[Redacted: hyperlink to internal website to which presentation materials are</i>	N/A	N/A	

## OOC Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
									<b>posted]</b>  LISCC Mem bers - - LISCC Mem bers Work space Home (frb.g ov)			
Interagency Large Institution Management (ILIM) Meeting	FDIC, OCC, and Federal Reserve/ Board LFBO and LISCC portfolio D.C. leadership engagement of large, supervised firms for interagency coordination	OC Chair Board LFBO Portfolio Leader LISCC Program and DST Co- Chairs <b>([Redacted: email address])</b>  Board LFBO officers and managers  Presenters and others determined based on agenda	Meeting Note Template (with all agencies seals)	Agenda Items/Pur pose, Presentati on Materials High-Level Discussion Topics	Depen ds on Agenc y Coordi nating the Meeti ng  Feder al Reserv e – 1 week after meeti ng	Rotates; Depende nt on the Agency Coordinat ing the Meeting Federal Reserve: LISCC Corporat e Secretary	2 days after Corpor ate Secreta ry review	For planning , CS Team OneNot e Files (ILIM Meeting - OneNot e LSCG Group ( Web view)  Backup meeting material versions	<b>[Redacted: hyper link to intern al websi te to which meeti ng mater ials are posted]</b>	N/A	At Agency Discretio n	- ILIM Charter is retained in ILIM workspace. - CS team coordinates for the Board/Federal Reserve - Four meetings a year, typically 9 am – Noon ET; one meeting typically in June is only scheduled for 1 hour - there are monthly FDIC/OCC/Board Only Principal only planning calls - there are also twice a month coordinator only planning calls

## OOC Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
								are someti mes shared on the CS Team Board shared drive				
LISCC / Board S&R Risk Function	Engagement between groups to provide Program updates and risk identification and monitoring	OC Chair Program Co-Chairs Board S&R Risk Function Team Presenters and others determined based on agenda	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	- CS team schedules meeting and tracks agenda topics for OC Chair - Typically, 4 times a year
Ad-Hoc Governor Meeting s with OC Chair	Updates from the Program	OC Chair	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	- CS team schedules meetings and tracks topics for OC Chair - As of October 2024, OC Chair is meeting monthly with <b>[Redacted: name]</b>
Meeting s & Agenda Manage ment (M&AM) Meeting	Discuss LISCC, OC-related, ILIM, Governor meeting potential topics and agendas; General	OC Chair CS Team – Staff Member and Corporate Secretary Communications Strategist COO and Deputy COO	N/A	N/A	N/A	N/A	N/A	For planning , CS Team OneNot e Files (Meetin g Manage	N/A	N/A	N/A	- Meetings held weekly

## OOC Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
	Planning and Communicati on Strategist updates							ment ( Web view)				
OOC Meetings												
OOCAC	Advisory body for the COO / DCOO, and OOC on operating program guidance, and receives updates on the LISCC Executive MIS package.	OOCAC members COO, DCOO, Corporate Secretary  Listen Only: OOC Function Leads	Readout	Agenda/P urpose Presentati on Materials High-Level Discussion Topics	2 to 3 days after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry review	For planning and draft readout, CS Team OneNot e Files (OOCAC Meeting Notes - OneNot e LSCG Group ( Web view)	OC Mem bers - OOC Advis ory Coun cil - All Docu ment s (frb.g ov)	At least three OOCAC member s	No	- Meetings scheduled monthly - OOCAC Charter is stored in OOCAC library. - As noted above, CS team facilitates the SC membership recommendations -Read-outs emailed to member and posted in native form (e.g., msg)
Operatio ns Commu nity Call	Updates on Program operational topics, new or pending operating guidance, etc.	Program / DST Operations Teams <b>(<i>[Redacted: email addresses]</i>)</b>  LISCC Exam Support Team (LEST) QA Manager	Readout / Different Format	High level overview	2 to 3 days after meeti ng	Corporat e Secretary	2 days after Corpor ate Secreta ry review	For planning and draft readout, CS Team OneNot e Files (2024 Operati ons Commu nity	OC Com mitte e Coord inator s Work space – Coord inator Team	N/A	N/A	- Meetings scheduled monthly

## OOC Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
								Call (Web view)	Meetings – Coordinator Meetings (frb.gov)			
Operations Leadership Call	Working discussions on operational challenges and opportunities to align practices	DCOO Corporate Secretary Program and DST Operations Leads	N/A	N/A	N/A	N/A	N/A	For planning, CS Team OneNote Files (2024 Operations Calls (Web view))	N/A	No	No	- Meetings scheduled weekly
OOC Function Leads Call	Management engagement, working discussion, planning, etc.	COO, DCOO OOC managers	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	- Meetings scheduled bi-weekly
OOC Team Meeting	Engagement across the OCC, topic vary	All OOC function ( <i>[Redacted: email address]</i> )	N/A	N/A	N/A	N/A	N/A	For planning, CS Team OneNote Files (2024 OOC Monthly Team	N/A	N/A	N/A	- Meetings scheduled every other month

OOO Operating Manual

Meeting	Purpose	Regular Invitees/ Attendees	Required Notes					Recordkeeping		Quorum Required	Proxies Allowed?	Notes
		(Includes Associated E-mail Group Name)	Form	Required Elements	Draft Due	Review and Approver	Timelin e to Post Final <sup>22</sup> , <sup>23</sup>	Drafts	Final			
								Meeting (Web view)				
LISCC Town Halls	Program engagement, topics vary	All LISCC Supervisory Program ( <i>[Redacted: email address]</i> )	N/A	N/A	N/A	N/A	N/A			N/A	N/A	- Town Halls held once or twice a year - Communication Strategist plans agenda with OC Chair

## OOO Operating Manual

### Meeting - Logistics and Catering

The CS team is responsible for coordinating with presenters and for certain meetings (e.g., “Quarterly” in-person/hybrid OC meetings, ILIMs), coordinating logistics and catering at the Board or working with assigned Reserve Bank coordinators. Before finalizing “quarterly” OC meetings, CS team discusses preliminary Reserve Bank in person locations with the OC Chair. Once initially agreed upon with the OC Chair, the CS team reaches out to the applicable Reserve Bank OC member to confirm ability to host and understand the available budget. Below is additional information and planning tools, as examples, that the CS team.

The CS team uses a OneNote to assist it in planning meeting logistics, for OC meetings the following location is used: OC Meeting Notes - OneNote LSCG Group (Web view).

Reference Documents for Meetings Held at the Board:

- Board Event Planning Guidelines
- ItB - Event planning guidelines (frb.gov)
- Microsoft Word - Meeting Room Capacities\_2024.docx (frb.gov)

Allow 10 to 30 days for planning events whenever possible. The larger the number of attendees (e.g., more than 12), the longer planning time required as large rooms are difficult to reserve. Below is certain logistical planning information.

#### **Room Reservations and AV Scheduling:**

Submit Event Space and Services Form, including Audio/Visual requests:

Room Request and Set Up; Note Board building location preferred

Set Up only

Note: If there are no Board attendees planned at a meeting (e.g., DST/DST Co-Chair meeting), there are series of additional steps required as in general the use of Board facilities is limited to official Board business. Any request by a Reserve Bank or federal department/agency, must include a sponsoring Board division. A request is required 30 days in advance of the proposed event. Additional information need include: Name of Outside Entity, Sponsoring Division, Point of Contact in Sponsoring Division, Proposed Date, Proposed Time, Preferred Event Location, Number of Guests, Audio Visual, Catering Requirements, and Purpose. In some cases, after talking to the applicable Board S&R Operations staff, Reserve Banks may be requested for a cost code to chargeback any fees.

#### **Food and Beverage:**

Submit Food and Beverage Form, including dietary restrictions, one week prior to event.

#### **Visitor Registration (for Reserve Bank participants):**

Submit Security/Visitor Registration list: Board On-line registration

**Day of Meeting:** Meet the Catering Team, AV /IT Team; Share contact numbers for meeting issues. For OC, set out OC member tent cards.

An example of an email message for OC meetings hosted at the Board, which is adjusted as needed for meetings hosted at Reserve Banks for their protocols:

OOO Operating Manual

**Subject: MONTH DATES** OOC Meeting: Agenda and Visitor Information

OC Members,

The MONTH DAY and DAY OC meeting will be held at the Board's S&R International Square building location in D.C.

**Reserve Bank OC Members:** Please go to 1850 K Street/International Square **each day** and proceed to the 4th floor security checkpoint to check in. Those attending in-person have been registered in the Board's Visitor Registration System for MONTH DAY and DAY. If you plan to arrive prior to MONTH DAY, please reach out to NAME to be registered in advance. Be prepared to show a valid driver's license or passport. Following check in, proceed to the XXth floor. A guard is scheduled to be posted at the XXth floor secured entrance. If you have issues or questions upon arrival at the Board, contact NAME at PHONE NUMBER.

**Meeting Information:**

Outlook calendar invitations have been updated with the meeting agenda, which is also attached for reference. Note that on Day 1 (MONTH DAY) there are two separate meeting invitations as follows:

- Executive Session (10:00 a.m. to 10:50 a.m.)** - *closed session for OC members only*
- Regular OC meeting session (10:55 a.m. to 4:00 p.m.)** - *DST Leads/Deputies and PLG members have been invited to listen-in on Day 1 and 2.*

For those attending in-person, the meeting will be held in conference room INSERT ROOM on the XXth floor from 10:00 a.m. to 4:00 p.m. (EST) on DAY OF WEEK, MONTH DAY and from 9:00 a.m. to 2:30 p.m. (EST) on DAY OF WEEK, MONTH DAY. Coffee and other beverages will be available 30 minutes prior to the start of the meeting each day and [DEPENDING ON BUDGET ALLOCATION - you are welcome to bring your own breakfast (BYOB). Lunch will be provided on Day 1 only. On Day 2 there will be a 1-hour lunch break to allow attendees to step out to purchase lunch. The International Square building a.k.a. The Square has a variety of food options. Also nearby are: Pret A Manger (1825 I Street NW), The Best Sandwich Place (919 18th Street NW) and Sweetgreen (888 17th Street NW).]

The following conference rooms have been reserved for anyone needing to take other calls/meetings while in person. Reach out to NAME if you need assistance locating a room:

- ROOM NUMBER
- ROOM NUMBER
- ROOM NUMBER

For other questions, the OperatingCommitteeCOO mailbox or a member of the CS team (INSERT NAMES).

For tracking in-person attendees for food/beverage (e.g., allergies), visitor registration, appropriate room size, etc. the following is an example of information captured in a “run of show”:

OC Meeting					
Name	Board/RB	Role (e.g., OC member, presenter)	Day 1 (e.g., Yes (in person), No, Hybrid)	Day 2 (e.g., Yes (in person), No, Hybrid)	Dietary Restrictions / Other Comments

## OOC Operating Manual

Meeting Information	Notes
Meeting Date	
Meeting Name	
Meeting Site and Address	
Meeting Room Name and Location (including floor, room number, etc.)	
CS Team Working Room Name and Location	
Breakout Room Names and Location (include floor, room number, etc.)	
Breakfast/Break/Lunch Locations (including floor, room number, etc.)	
Key Contacts	

Day 1		
Time (EST)	Activity	Notes/Comments
	<b>Arrival of OC Members</b> Location and Rooms	Provide Visitor Registration Instructions to be shared with OC members.  FRB-NY uses Omnigo - event planner will register all guests. CS team to provide meeting participant list.
	<b>Coffee &amp; Other Beverages</b> Location	
	<b>OC Meeting</b> Location	<ul style="list-style-type: none"> <li>Conference room table to seat ALL OC members comfortably at the table; <b><i>Preferred conference room set-up:</i></b> Hollow Square or Rectangle</li> <li>Additional perimeter seating, if possible</li> <li>Media strips available on conference room table</li> <li>Audio/Visual support to assist with opening Teams link in meeting room. <b>Note for Reserve Bank AV Team:</b> MS Teams link is generated by the Board that produces a different Tenant Key (<b><i>[Redacted: email address]</i></b>) that may need to be manually entered for the MS Teams link to function at a Reserve Bank conference room.</li> <li>Audio/Visual support to set up table mics (if needed)</li> <li>WiFi login/passwords – Elmo/Guest Wifi</li> <li>Notepads and pens, if available</li> </ul> <b>CS team:</b> Print new table tents (first, last name only) and ship to FRB in advance of the meeting.
(tentatively)	<b>Lunch Break</b> Location	Number of in-person attendees: <b>XX</b> (order for XX)
(tentatively)	<b>Afternoon Break</b> Location	Number of in-person attendees: <b>XX</b> (order for XX)
(tentatively)	Departure of Meeting Participants	Include any special exit instructions

## OOC Operating Manual

Day 2		
	<b>Arrival of OC Members</b> Location and Rooms	Provide Visitor Registration Instructions to be shared with OC members.
	<b>Coffee &amp; Other Beverages</b> Location	
	<b>OC Meeting</b> Location	See notes above
<i>(tentatively)</i>	<b>Lunch Break</b> Location	Number of in-person attendees: <b>XX</b> (order for XX)
<i>(tentatively)</i>	<b>Afternoon Break</b> Location	Number of in-person attendees: <b>XX</b> (order for XX)
<i>(tentatively)</i>	Departure of Meeting Participants	Include any special exit instructions



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