



BSA/ALM Program

Overview

As required by Corporate One's Business Continuity Policy, business recovery testing is conducted as part of enterprise and individual department business continuity plans at least annually. The testing plans are designed to achieve the following objectives:

- ★ Determine the state of readiness of Corporate One to cope with a disruption
- ★ Determine whether resources required for recovery are available
- ★ Determine whether the Business Continuity Plan has been properly maintained
- ★ Manage the expectations of the user community as to what they can expect in the event of an actual incident

To achieve these objectives, Corporate One's Board of Directors mandates several components of testing be conducted, including:

- ★ During testing, any plan that fails to meet expectations will be reviewed and edited by the business unit and a retest scheduled if applicable
- ★ Testing must occur at least annually, at an interval not to exceed 12 months
- ★ Testing is conducted in a manner that member impact/risk is minimized, if not eliminated all together
- ★ Testing occurs between Corporate One and key service providers

Resources

A fully functional and accessible business recovery center is critical to the successful shift of our daily operations to another site in the event of a business recovery need. Our alternate site recovery area is a multi-purpose building complete with full communications capability, redundant systems and back-up generators, located in Hilliard, Ohio. At the site each department has sufficient office supplies and forms stored to operate for multiple days or weeks. Additionally, there are secured areas for critical business functions and dedicated warehouse space for storage. In a business recovery situation, all departments would be accommodated to the alternate site with the exception of Item Processing. The Item Processing department would be dispatched to an alternative business recovery center in Oklahoma City, OK, if needed.

If Corporate One encounters a situation that affects both the main headquarters and the local alternate site, Corporate One has contracted with a service provider to utilize mobile office space as well as provide alternate system capabilities to restore all critical processes. While Corporate One considers this set of circumstances highly unlikely, plans have been made to ensure critical processes are restored.



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Test Plan Approach for 2010/2011 Test Exercises

As part of Corporate One's commitment to maintaining a strong Business Continuity Program, the Board has appointed an individual responsible for the oversight of the Enterprise Business Continuity Plan—the Business Continuity Director. This oversight ensures all department plans are compliant and integrate within the overall goals and objectives established by the Board, while meeting all regulatory requirements and incorporating industry best practices.

The 2010 test plan focused on all critical applications performed by the various business units. Risk Assessments, Business Impact Analysis and Test Plans & Scripts were reviewed and updated as needed by each business unit manager, and these documents were submitted prior to testing to the Business Continuity Director (BDC) for further review per a newly added requirement to do so. The 2010 testing of critical processes also included the use of independent third party observers in addition to Corporate One's IT staff and Risk Management staff.

In 2011, the test approach followed that of the previous year's plan. Risk Assessments, Business Impact Analysis and Test Plans & Scripts were updated as needed and reviewed by each business unit manager and by the Business Continuity Director. During the testing, observers were present from Corporate One's IT staff and Risk Management staff.

Testing Results - Summary

2010 - Critical processes were tested on March 4 & 5, 2010, and began with Information Technology performing system restoration testing. After the roll-in of all system applications and related components, business units completed their testing by following their department test plans and scripts. Non-critical processes were tested September 16 & 17, 2010. This testing followed the same format as the March 2010 test for critical processes.

2011 – Critical processes were tested March 3 & 4, 2011 and followed the same format as the March 2010 test. Information Technology performed systems restoration testing at Corporate One's alternate site. This was followed by the business units performing their testing using their department test plans and scripts. The business unit testing was also performed at the alternate site. The subsequent results from the testing were shared with Senior Management and Staff, Corporate One's Board of Directors and EWRM Committee. Non-critical processes are tentatively scheduled for testing in September 2011.

Results of all business continuity testing are reviewed by Corporate One Staff and Senior Management. This process is to ensure business owners have identified and corrected weaknesses in test plans, scripts, and/or recovery plans, if found. Final test results are then submitted for review to Corporate One's Board of Directors, Supervisory Committee and Enterprise-Wide Risk Management Committee. All documentation related to business continuity plans and test results are made available to the National Credit Union Administration (NCUA) as well as to Corporate One's internal and external auditors.

For more information about our business recovery testing efforts, please contact Corporate One's Operational Risk Manager at 866/MyCorp 1 (692-6771).