		Risk Assessment – Board & Management Oversight					
	Risk Description	**Completely Implemented**	**Partially Implemented**	**Aware, But Not Implemented**	**No Awareness**	**Not Applicable**	**Risk Rating**
	Board Oversight						
1	Has the Board approved the bank's written information security policy and program that complies with the GLB Act's Guidelines?						
2	Does the Board oversee management's efforts to develop, implement, and maintain an effective information security program?						
3	Has the Board approved the bank's written Internet Banking policy and/or policies that complies with the interagency guidelines?						
4	Does the Board oversee management's efforts to develop, implement, and maintain an effective Internet Banking program?						
	Management Oversight						
5	Has management developed, implemented, and maintain an effective information security program that complies with the GLB Act's Guidelines?						
6	Does management evaluate the impact on the bank's security program of changing business arrangements, such as mergers and acquisitions, alliances and joint ventures, outsourcing arrangements, and changes to customer information systems?						
7	Does management document its compliance with the Guidelines?						
8	Does management report to the Board on the overall status of the information security program?						

	Risk Description	Risk Assessment					Risk Rating
		Completely Implemented	Partially Implemented	Aware, But Not Implemented	No Awareness	Not Applicable	
9	Does management make reports to the Board which include all material matters in five areas: (1) risk assessment; (2) risk management and control decisions; (3) results of testing; (4) attempted or actual security breaches or violations and responsive actions taken by management; and (5) any recommendations for improvements in the information security program?						
10	Does management develop, implement, and maintain an effective Internet banking program that complies with the interagency requirements?						
11	Has management conducted a thorough risk assessment for the categories and/or areas applicable to Internet banking service?						
12	Has management developed internal policies and/or procedures to effectively maintain the risks identified?						
13	Has management conducted and implemented appropriate measures for vendor outsourcing?						
14	Based upon the risks identified through the assessment, has management established internal controls and purchased additional insurance coverage to mitigate the risks associated with Internet Banking?						
15	Does management meet regularly to review outstanding issues and monitor progress on implemented controls?						
16	Does management report to the Board on the overall status of the Internet Banking program?						

	Risk Description	Risk Assessment					Risk Rating
		Completely Implemented	Partially Implemented	Aware, But Not Implemented	No Awareness	Not Applicable	
17	Has management established appropriate response programs in the event of computer or other technological failure, including, where appropriate, reconstructing lost or damaged customer information (contingency/disaster recovery)?						
18	Does management provide adequate training to all employees according to their job specifications?						
19	Has management established regular documented testing of the key controls, systems, procedures, contingency and recovery plans?						