**SANITIZED SAMPLE**

*Institution identifiers removed. Vendor and platform names retained.*

# Business Impact Analysis
## Exercise Report

**Client Institution**

Loan Servicing

Exercise Date: August 20, 2026
Report Date: September 7, 2026

Prepared by
**BNP, Inc. | Bankers New Paradigm**

*Confidential and Proprietary*

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## 1. Exercise Summary

BNP, Inc. facilitated a Business Impact Analysis (BIA) exercise with the Loan Servicing department on August 20, 2026 as part of the institution's ongoing Business Continuity Management (BCM) program. The purpose of the exercise was to validate the department's documented business functions, confirm or correct their recovery objectives and business impact ratings, refresh the inventory of technology and third-party dependencies supporting those functions, and identify recovery gaps requiring management attention. The session was conducted as a structured interview with a screen-shared review of the department's current BCM records, and its results have been entered into the BCM system of record and reflected in the Business Function Detail, Resources in Use, and Threat Assessment / Incident Response extracts dated September 6, 2026.

The session served a second purpose. Loan Servicing's manager also oversees work that had not previously been carried as a distinct department, and during this exercise that work was established as Loan Settlement, a separate department with its own business functions. This report is scoped to Loan Servicing only; Loan Settlement is addressed in a companion report.

| Item | Detail |
|---|---|
| Exercise Date | August 20, 2026, 2:30 p.m. ET (1:30 p.m. CT); scheduled 30-minute session, recording duration approximately 22 minutes, covering both Loan Servicing and the newly established Loan Settlement department |
| Report Date | September 7, 2026 |
| Client / Department | Loan Servicing (Loan Operations division) |
| Participants | Department Manager (client); Steve Carroll, BCM Facilitator (BNP, Inc.) |
| Scope | All eleven business functions assigned to Loan Servicing. Two functions — Credit Bureau Maintenance and Loan Payoffs — were reviewed in detail; the remaining nine were confirmed unchanged by management statement and were not re-reviewed individually |
| Format | Virtual session (Microsoft Teams), structured interview with screen-shared review of current BCM function, interdependency, and resource records; session recorded and transcribed |
| Overall Outcome | All eleven functions remain active. One previously undocumented dependency was added, one function was downgraded from Level 1 to Level 2, one dependency was deliberately excluded with recorded rationale, and generic bank-wide infrastructure dependencies were removed from the department's interdependency lists. A separate department, Loan Settlement, was established during the same session and is covered by its own report |

### BCM Program Objectives Supported

The exercise supported five objectives of the institution's BCM program: annual validation of business function documentation, confirmation that recovery objectives remain aligned to actual operational tolerance, refresh of the resource, technology, and third-party dependency inventory, detection of recovery gaps between function requirements and supporting resource capability, and maintenance of regulatory and examiner readiness. Each objective was addressed during the session, and the resulting changes were applied to the BCM system of record and re-extracted on September 6, 2026.

## Management Validation Activities

Departmental management reviewed the department's function list in full and confirmed it complete and unchanged from the prior review cycle. Management reviewed in detail the interdependency list and criticality rating for the department's two highest-rated functions, identified a software dependency absent from the record, supplied the operational rationale for excluding a second dependency, described the operational workaround that supported a criticality downgrade, and confirmed the department's physical location and division assignment. Management also confirmed that the department's work is distinct in staffing and responsibility from the work established during the same session as Loan Settlement.

Management confirmed no other organizational, departmental, or system changes since the prior review. The facilitator advised management during the session that generic bank-wide infrastructure entries would be removed from the department's interdependency lists and that resource-level contingency detail would be expanded following the session; both changes are reflected in the September 6 extracts.

## 2. Discussion Highlights

### 2.1 Critical Business Function Validation

Eleven business functions are assigned to Loan Servicing. All eleven remain active, and none was deactivated, renamed, or newly added during this cycle. One function — Loan Payoffs — had its criticality rating reduced following a review of the operational workaround available when the supporting system is unavailable. The remaining ten retain the criticality levels recorded at the prior review.

Management reviewed the function list in full and confirmed it complete. Detailed line-by-line review was performed on the department's two Level 1 functions as they stood at the start of the session, Credit Bureau Maintenance and Loan Payoffs. The other nine functions were confirmed unchanged by a single management statement covering the list as a whole rather than by individual review, a scope characteristic recorded in Section 3.6 and carried into the follow-up tasks.

**Active Business Functions Confirmed**

| Business Function | Critical Level | RTO (hrs) | RPO (hrs) | MTD (hrs) | PII Impact |
|---|---|---|---|---|---|
| Credit Bureau Maintenance | Level 1 | 24 | 24 | 48 | High |
| Loan Chargeoffs | Level 2 | 72 | 24 | 120 | High |
| Loan File Maintenance | Level 2 | 72 | 24 | 120 | High |
| Loan Payoffs | Level 2 | 48 | 24 | 96 | High |
| Loan Rate Changes | Level 2 | 24 | 24 | 48 | High |
| Process all back-office journals | Level 2 | 24 | 24 | 48 | High |
| Process and balance daily loan transactions | Level 2 | 24 | 24 | 48 | High |
| Process Collateral Releases | Level 3 | 72 | 24 | 120 | High |
| Process mail loan payments | Level 2 | 48 | 24 | 72 | High |
| Provide branch support for loan accounts | Level 2 | 24 | 24 | 48 | High |
| Work Prior Day Loan Reports | Level 2 | 72 | 24 | 120 | High |

**Business Function Status Changes**

| Business Function | Action | Rationale |
|---|---|---|
| Loan Payoffs | Criticality downgraded, Level 1 to Level 2 | Management confirmed the function covers processing a payoff rather than quoting one, and that a system outage is absorbed by processing the payoff the following day and backdating the transaction, with no interest charged for the additional day. The facilitator concluded that the available workaround provided sufficient tolerance to reduce the rating. Recovery objectives were revised to 48 / 24 / 96 hours following the session. |
| Credit Bureau Maintenance | Dependency added | Silverlake Explorer, the application used to access and verify credit bureau information within the SilverLake environment, was absent from the function's interdependency list and was identified by management |

| Business Function | Action | Rationale |
|---|---|---|
| | | during the session. It was added as a dependency and a resource record was created. |
| Credit Bureau Maintenance | Dependency deliberately excluded | The facilitator asked whether SilverLake Core access should be added as a dependency. Management stated that a core outage affects the entire bank and is immediately apparent to all staff, making a department-specific contingency note unnecessary. The exclusion was retained and the rationale recorded. |
| All functions | Interdependencies trimmed | Generic bank-wide infrastructure entries — PC and workstation hardware, telephone, and to some extent email — were removed from the department's interdependency lists on the stated rationale that their failure is immediately obvious, bank-wide in effect, and addressed through the enterprise help desk rather than through a departmental contingency. |
| Remaining nine functions | Validated — no change | Loan Chargeoffs, Loan File Maintenance, Loan Rate Changes, Process all back-office journals, Process and balance daily loan transactions, Process Collateral Releases, Process mail loan payments, Provide branch support for loan accounts, and Work Prior Day Loan Reports were confirmed unchanged by management statement covering the function list as a whole. |

## 2.2 Recovery Objective Review

### Changed Recovery Objectives

One function's recovery objectives changed during this cycle. Loan Payoffs moved from Level 1 to Level 2 and now carries 48 / 24 / 96 hours. The criticality decision was made explicitly during the session and confirmed by management; the specific hour values were not established on the call and were set following the session, in the course of applying the criticality change to the system of record. The rating is management's; the numbers beneath it are the facilitator's, and they have not yet been confirmed back to the department. This is recorded as an open item in Section 4.

No other recovery time objective, recovery point objective, or maximum tolerable downtime value was changed. The remaining ten functions retain the values recorded at the prior review, and business impact ratings were carried forward without change across all eleven.

### Confirmed Recovery Objectives

The department's profile is now a single Level 1 function, nine at Level 2, and one at Level 3. Credit Bureau Maintenance is the sole Level 1 and carries the department's tightest objectives at 24 / 24 / 48 hours. It is also the only function in the department carrying a High rating on any business impact dimension, rated High for both reputation and legal or regulatory exposure, which is consistent with the consumer credit reporting obligations the function discharges. Process Collateral Releases sits alone at Level 3 with 72 / 24 / 120 hours and Low impact across all four dimensions.

Four functions share the 24 / 24 / 48 profile alongside Credit Bureau Maintenance — Loan Rate Changes, Process all back-office journals, Process and balance daily loan transactions, and Provide branch support for loan accounts — but at Level 2. The department's objectives are therefore compressed: five of eleven functions require restoration within 24 hours, and the shortest maximum tolerable downtime in the department is 48 hours.

## 2.3 Resource Dependency Review

Nine resources support the department's eleven business functions across 37 function-to-resource dependencies. The inventory divides into three groups: the SilverLake platform family supplied by Jack Henry & Associates, general-purpose business applications, and shared infrastructure.

### Resource Inventory

| Resource | Type | RTO (hrs) | Time Frame Source | Validation | Functions |
|---|---|---|---|---|---|
| Silverlake Core | Core System | 12 | Vendor SLA | Vendor attestation | 9 |
| Silverlake Explorer | Business App | 24 | Vendor SLA | Vendor attestation | 1 |
| General Ledger - G/L (Silverlake) | Business App | 24 | Vendor SLA | Vendor attestation | 1 |
| Synergy | Business App | 24 | Internal SLA (IT) | Not recorded | 4 |
| TransUnion | External Provider | 24 | Vendor SLA | Vendor attestation | 1 |
| MS Teams | Business App | 24 | Vendor SLA | Vendor attestation | 1 |
| MS Office | Business App | 4 | Internal SLA (IT) | DR testing; tabletop | 4 |
| Network/Internet | Business App | 4 | Internal SLA (IT) | Internal DR testing | 11 |
| Adobe Acrobat Pro | Business App | 24 | Internal SLA (LOB) | Internal DR testing | 5 |

Silverlake Core is the department's most widely relied-upon system of record, supporting nine of eleven functions at a 12-hour recovery time objective backed by a vendor service level agreement and a vendor-supplied attestation. Silverlake Explorer, added during this exercise, provides access to customer, account, and integrated credit bureau information within the SilverLake environment and supports Credit Bureau Maintenance at 24 hours. General Ledger - G/L (Silverlake) supports back-office journal processing at 24 hours. Synergy, the document management system holding scanned loan documents, supports four functions at 24 hours.

TransUnion is the department's only externally provided service resource, supporting Credit Bureau Maintenance at a 24-hour objective backed by a vendor service level agreement and attestation. Adobe Acrobat Pro supports five functions and MS Office four, both as workstation applications with internally set recovery time frames validated through internal DR testing. MS Teams supports branch support communication at 24 hours. Network/Internet is the only resource common to all eleven functions, recovering at 4 hours with a 24-hour maximum tolerable downtime.

## 2.4 Technology and Third-Party Dependencies

The department's dependency profile is defined by concentration rather than dispersion. Four of the nine resources — Silverlake Core, Silverlake Explorer, General Ledger - G/L (Silverlake), and Synergy — are supplied by Jack Henry & Associates. Taken together, those four resources support all eleven of the department's business functions. There is no function in Loan Servicing whose continued operation is independent of a single vendor relationship.

The concentration is deepest at Silverlake Core, which alone supports nine functions and serves as the system of record for loan account data, transaction posting, balance adjustment, payoff calculation, and collateral status. The documented contingency for seven of those nine dependencies is to suspend the activity until service is restored; for the remaining two — Process mail loan payments and Provide branch support for loan accounts — the department continues receiving and logging work while posting is deferred. Management characterised this exposure directly during the session, observing that if the core is unavailable the outage is bank-wide and immediately apparent to everyone, which was the stated basis for excluding core access as a separately documented dependency of Credit Bureau Maintenance.

Third-party service provider records exist for two vendors: Jack Henry & Associates, linked to its four resources, and Adobe, linked to Adobe Acrobat Pro. No service provider record is associated with TransUnion, MS Office, MS Teams, or Network/Internet. The TransUnion omission is the material one: the resource is classified as an external provider service, its recovery time frame is sourced from a vendor service level agreement, and the vendor relationship is nonetheless not recorded in the third-party inventory for this department. Microsoft is likewise absent as a provider despite two Microsoft products appearing in the resource list.

## 2.5 Operational Changes Since Prior Review

Management characterised the year as substantially unchanged, confirming that the function list and the supporting reports issued ahead of the session were the same as those reviewed in the prior cycle and that no function had been added, retired, or materially altered.

The changes recorded arise from three sources. The first is a correction to the record rather than an operational change: Silverlake Explorer had been in continuous use to access and verify credit bureau information but was not documented as a dependency of Credit Bureau Maintenance. Management raised this directly and noted uncertainty as to why the SilverLake application did not appear across other functions where it might apply — a question the session did not resolve and which is carried forward as a follow-up task.

The second is a departmental change. Work previously grouped informally with Loan Servicing was established during this session as a separate department, Loan Settlement, on management's confirmation that the two are staffed by distinctly different people and perform genuinely different work. The prior cycle's third department under the same manager, Loan Funding, had already been renamed Loan Booking and moved to separate ownership earlier the same day.

The third is a documentation change applied by the facilitator following the session: the removal of generic bank-wide infrastructure entries from the department's interdependency lists, and the expansion of contingency detail text across the retained dependencies. Both are described in Section 2.6 and assessed in Section 3.6.

## 2.6 Continuity Strategy Review

Five contingency strategies are in use across the department's 37 dependencies. Relocation to a remote office is applied to Network/Internet on all eleven functions, supported by VPN access. Suspension of activity until the resource is restored applies to Silverlake Core on seven functions and to General Ledger - G/L (Silverlake) on back-office journal processing, in each case where no substitute exists for the system of record. Partial completion and hold applies to eleven dependencies, including all four Synergy links and the two Credit Bureau Maintenance links to Silverlake Explorer and TransUnion. Alternate provider applies principally to Adobe Acrobat Pro and MS Office, where substitute tools are available for document handling, and to MS Teams, where telephone and email substitute for chat. Manual process substitution applies to a single dependency, MS Office on Loan Chargeoffs.

The distribution is coherent with the department's operating reality: where the system of record is unavailable the work stops, where a document or communication tool is unavailable the work continues by other means, and where an external service is unavailable the work is held in queue. Management described the last case concretely for Credit Bureau Maintenance, explaining that dispute submissions arriving through e-Oscar simply remain in the team's email inbox until the supporting system returns, at which point they are submitted as normal.

The infrastructure trim applied following the session is defensible on the rationale management and the facilitator agreed during the call, and it materially improves the readability of the department's dependency records. Its consequence is that the department's documented dependency set no longer reflects workstation hardware or telephony. That is a deliberate scoping decision resting on the enterprise help desk process rather than an omission, but it is a decision an examiner may ask to see stated. Recording the rationale once at the program level, rather than leaving it implicit in the absence of entries, is carried forward as a follow-up task.

## 2.7 Management Challenge and Validation

The facilitator tested the department's existing documentation at several points rather than accepting it, and the exercise produced a correction in each case where it was tested.

On the department structure, the facilitator asked directly whether Loan Servicing and Loan Settlement should be maintained as two departments or combined, and whether they were staffed by distinctly different people. Management answered without qualification that they are distinctly different people and two different departments, which established the basis for creating Loan Settlement as a separate department rather than absorbing its functions into the existing record.

On the interdependency list for Credit Bureau Maintenance, the facilitator proposed trimming the list to the material risk and asked whether the substantive exposure was the inability to reach TransUnion. Management did not simply accept the framing, responding that the function also requires internet access, email, and “the actual software.” The facilitator asked what that software was called, and management named the SilverLake application used to access credit bureau information. That exchange is what surfaced Silverlake Explorer, a dependency in continuous operational use that had been absent from the record. Management added that it was unclear why the same application did not appear on other functions where it might apply.

On the availability of a substitute credit bureau, the facilitator asked whether other credit bureaus could be used if TransUnion were unavailable. Management explained that disputes are submitted through e-Oscar back to TransUnion and that TransUnion itself must be updated, so an outage produces delayed processing rather than redirected processing. The answer establishes that no substitute bureau exists for this function, which bears directly on the recovery strategy recorded for that resource and is addressed in Section 3.2.

On the contingency for that same function, the facilitator proposed a partial-completion strategy under which work would be re-entered when the system returned. Management corrected the proposal, stating that nothing would be entered and that there is nothing for the team to do until the software is available again — the work is simply held. The facilitator confirmed the mechanism by restating it as transactions sitting in the queue until the system opens, and management confirmed that requests remain in the team's email inbox until then. The exchange established the department's actual response with precision and is the basis for the observation in Section 3.6 regarding the contingency text subsequently recorded.

On the exclusion of core access from Credit Bureau Maintenance, the facilitator asked whether it should be added. Management supplied the reasoning rather than a preference, noting that a core outage is bank-wide and known to everyone immediately. The facilitator accepted the rationale and recorded the exclusion rather than overriding it.

On Loan Payoffs, the facilitator first established scope by asking whether the function covers quoting a payoff or processing one, then tested the Level 1 rating against the consequence of an outage. Management described the workaround in operational terms: the payoff is processed the following day and backdated, with no interest charged for the additional day. The facilitator concluded that the workaround afforded sufficient tolerance to reduce the rating and stated the reasoning explicitly during the session. The facilitator then tested the role of Synergy in the same function, establishing that the request image is saved to Synergy as evidence of who requested the payoff, currently by manual transfer and prospectively automatically once workflow automation is deployed, and that human review will remain necessary for some tasks after that deployment.

## 3. Key Observations

### 3.1 Recovery Objective Observations

#### Changed Recovery Objectives

One recovery objective changed during this exercise. Loan Payoffs was downgraded from Level 1 to Level 2 and now carries 48 / 24 / 96 hours against a prior profile aligned to the department's Level 1 tier. The downgrade is well grounded: management described a specific, routinely available workaround — next-day processing with the transaction backdated and no interest charged for the intervening day — and the facilitator tested that workaround against the criticality rating before concluding it afforded sufficient tolerance. A criticality reduction supported by a described operational substitute is a stronger record than the rating it replaced.

The qualification is that the criticality decision and the hour values were established at different times by different parties. Management confirmed the rating change on the call; the 48 / 24 / 96 values were set afterward while applying the change to the system of record and were not put back to the department for confirmation. Recovery objectives that management has not seen are assumptions, however reasonable, and they now sit on a function that until this cycle was one of only two Level 1 functions in the department.

#### Newly Established Recovery Requirements

One resource entered the department's inventory during this exercise. Silverlake Explorer was recorded at 24 / 24 / 72 hours with a Vendor SLA time frame source and a vendor-supplied attestation, and a recovery confidence rating of High. Unlike a resource seeded from its function's own targets, this record rests on a vendor commitment from the outset, and it enters the inventory substantiated rather than provisional. That is the correct outcome for a newly documented dependency and it is worth stating plainly.

#### Recovery Objectives Confirmed

The department's objectives are compressed relative to the work they cover. Five of eleven functions require restoration within 24 hours and carry a 48-hour maximum tolerable downtime, which is the shortest tolerance recorded anywhere in the department. Following the Loan Payoffs downgrade, only Credit Bureau Maintenance remains at Level 1, and it sits in that 24 / 24 / 48 tier alongside four Level 2 functions carrying identical objectives. The criticality tier and the recovery objectives therefore no longer discriminate between those five functions; the tier is the only thing separating the department's most urgent function from four others that must be restored just as quickly.

### 3.2 Dependency Observations

#### Newly Identified Dependencies

Silverlake Explorer is the exercise's principal dependency finding. Before this session, Credit Bureau Maintenance — the department's only Level 1 function, and the only function carrying a High rating for both reputation and legal or regulatory impact — was documented without reference to the application through which the work is actually performed. The application was in continuous operational use throughout. The omission was surfaced not by the record but by management volunteering it when the facilitator proposed narrowing the interdependency list, and the associated resource record and Jack Henry service provider link have now been created.

The finding does not close cleanly. Management observed during the session that it was unclear why the same SilverLake application did not appear as a dependency on other functions where it might reasonably apply. That question was not investigated during this exercise, and the September 6 extract shows Silverlake Explorer linked to Credit Bureau Maintenance only. Nine of the department's eleven functions were confirmed by blanket statement rather than individual review in this cycle, which is precisely the review posture least likely to surface a repeat of the same omission elsewhere. The question management raised should be answered against the record rather than left open.

**Technology Concentration Risk — Jack Henry & Associates**

Vendor concentration in Loan Servicing is high and is the department's defining structural characteristic. Four of nine resources — Silverlake Core, Silverlake Explorer, General Ledger - G/L (Silverlake), and Synergy — are supplied by Jack Henry & Associates, and between them those four resources support all eleven business functions. No function in the department is independent of that single vendor relationship.

The exposure is bounded in two respects and unbounded in a third. It is bounded by evidence: three of the four Jack Henry resources carry vendor service level agreements with vendor-supplied attestations and High recovery confidence, so the recovery commitments are substantiated rather than assumed. It is bounded by headroom: Silverlake Core recovers at 12 hours against function objectives ranging from 24 to 72 hours, leaving margin on every dependency. What is not bounded is correlation. The four resources are not four independent vendor relationships that happen to share a name; a disruption at the provider, or to the platform family itself, would not respect the boundaries between them. The department's recovery gap analysis treats each dependency separately, and on that basis every one of them is satisfactory. A scenario in which the SilverLake platform is unavailable is not represented in the analysis at all.

**Secondary Concentration — Shared Infrastructure**

Network/Internet supports all eleven functions and is the only resource common to the entire portfolio. Its 4-hour recovery time objective and 24-hour maximum tolerable downtime are supported by internal DR testing with High recovery confidence, and it recovers faster than any function it supports. The material observation is that the documented contingency for that resource on every function is relocation to a remote office, which itself depends on network connectivity and VPN access. The strategy is appropriate for a site-level disruption and does not respond to an enterprise connectivity failure. The distinction is not drawn in the current records.

**Unrecorded Third-Party Service Providers**

Third-party service provider records are attached to two vendors, Jack Henry & Associates and Adobe. TransUnion carries none. That resource is classified as an external provider service, its recovery time frame is sourced from a vendor service level agreement, and it is the only genuinely external dependency in the department's inventory — yet the vendor relationship supporting the department's sole Level 1 function does not appear in its third-party record. Microsoft is likewise unrecorded despite supplying both MS Office and MS Teams. Where third-party risk management and business continuity records are reconciled, these omissions will read as gaps in the dependency inventory rather than as absent relationships.

## 3.3 Resource Recovery Gap Assessment

A recovery gap exists where a resource cannot be restored as quickly as the business function depending on it requires — that is, where the resource recovery time objective exceeds the function recovery time objective. A positive gap value indicates the resource recovers faster than the function requires, leaving headroom; a value of zero indicates the resource and function recover in exactly the same window, with no margin; a negative value would indicate a true gap in which the function cannot meet its objective. The table below presents all 37 function-to-resource dependencies for Loan Servicing.

| Business Function | Resource | Func. RTO | Res. RTO | Gap | Implication |
|---|---|---|---|---|---|
| Credit Bureau Maintenance | Silverlake Explorer | 24 | 24 | **0** | No margin. Vendor-attested time frame, but the function's only path to credit bureau data. |
| Credit Bureau Maintenance | TransUnion | 24 | 24 | **0** | No margin. No substitute bureau exists; recovery strategy nonetheless records an alternate provider. |
| Credit Bureau Maintenance | Adobe Acrobat Pro | 24 | 24 | **0** | No margin, but documented alternates exist and the resource time frame is internally set. |
| Credit Bureau Maintenance | Network/Internet | 24 | 4 | 20 | Headroom. Contingency is relocation to a remote office with VPN. |
| Loan Chargeoffs | Silverlake Core | 72 | 12 | 60 | Substantial headroom. Activity suspends until service is restored. |
| Loan Chargeoffs | Synergy | 72 | 24 | 48 | Headroom. Resource time frame is internally set and its validation status is not recorded. |
| Loan Chargeoffs | Adobe Acrobat Pro | 72 | 24 | 48 | Headroom. Contingency detail on this dependency names Synergy rather than Adobe — see 3.6. |
| Loan Chargeoffs | MS Office | 72 | 4 | 68 | Substantial headroom. Manual process substitutes. |
| Loan Chargeoffs | Network/Internet | 72 | 4 | 68 | Substantial headroom. |
| Loan File Maintenance | Silverlake Core | 72 | 12 | 60 | Substantial headroom. Activity suspends until service is restored. |
| Loan File Maintenance | Adobe Acrobat Pro | 72 | 24 | 48 | Headroom. Documented alternates exist. |
| Loan File Maintenance | Network/Internet | 72 | 4 | 68 | Substantial headroom. |
| Loan Payoffs | Synergy | 48 | 24 | 24 | Headroom against a function objective revised after the session, not confirmed with management. |
| Loan Payoffs | Silverlake Core | 48 | 12 | 36 | Headroom. Activity suspends until service is restored. |
| Loan Payoffs | MS Office | 48 | 4 | 44 | Substantial headroom. |
| Loan Payoffs | Network/Internet | 48 | 4 | 44 | Substantial headroom. |
| Loan Rate Changes | Synergy | 24 | 24 | **0** | No margin, on a resource whose time frame validation status is not recorded. |

| Business Function | Resource | Func. RTO | Res. RTO | Gap | Implication |
|---|---|---|---|---|---|
| Loan Rate Changes | Silverlake Core | 24 | 12 | 12 | Limited headroom against the department's shortest MTD tier. |
| Loan Rate Changes | MS Office | 24 | 4 | 20 | Headroom. Documented alternates exist. |
| Loan Rate Changes | Network/Internet | 24 | 4 | 20 | Headroom. |
| Process all back-office journals | General Ledger - G/L | 24 | 24 | **0** | No margin. Vendor-attested, but no substitute for journal posting. |
| Process all back-office journals | Adobe Acrobat Pro | 24 | 24 | **0** | No margin, though contingency states journal processing continues while the ledger is available. |
| Process all back-office journals | Network/Internet | 24 | 4 | 20 | Headroom. |
| Process and balance daily loan transactions | Silverlake Core | 24 | 12 | 12 | Limited headroom. Activity suspends until service is restored. |
| Process and balance daily loan transactions | Network/Internet | 24 | 4 | 20 | Headroom. |
| Process Collateral Releases | Silverlake Core | 72 | 12 | 60 | Substantial headroom on the department's only Level 3 function. |
| Process Collateral Releases | Adobe Acrobat Pro | 72 | 24 | 48 | Headroom. Documented alternates exist. |
| Process Collateral Releases | MS Office | 72 | 4 | 68 | Substantial headroom. |
| Process Collateral Releases | Network/Internet | 72 | 4 | 68 | Substantial headroom. |
| Process mail loan payments | Silverlake Core | 48 | 12 | 36 | Headroom. Payments are received, endorsed and logged while posting is deferred. |
| Process mail loan payments | Network/Internet | 48 | 4 | 44 | Substantial headroom. |
| Provide branch support for loan accounts | Synergy | 24 | 24 | **0** | No margin, on a resource whose time frame validation status is not recorded. |
| Provide branch support for loan accounts | MS Teams | 24 | 24 | **0** | No margin, but telephone and email are documented substitutes. |
| Provide branch support for loan accounts | Silverlake Core | 24 | 12 | 12 | Limited headroom. Inquiries are received and researched while account work is deferred. |
| Provide branch support for loan accounts | Network/Internet | 24 | 4 | 20 | Headroom, but the contingency text on this dependency describes SilverLake Core — |

| Business Function | Resource | Func. RTO | Res. RTO | Gap | Implication |
|---|---|---|---|---|---|
| | | | | | see 3.6. |
| Work Prior Day Loan Reports | Silverlake Core | 72 | 12 | 60 | Substantial headroom. Activity suspends until service is restored. |
| Work Prior Day Loan Reports | Network/Internet | 72 | 4 | 68 | Substantial headroom. |

No negative recovery gap exists in this department. Every documented resource recovery time objective either matches or is shorter than the objective of the function it supports, and every resource record carries a populated recovery time objective, so no gap value in the table is computed against an empty field. That is a materially better baseline than departments in which the arithmetic cannot be performed at all, and it should be read as a genuine strength of the record.

Eight of the 37 dependencies show a gap of exactly zero. Their significance is not uniform, and treating them as a single category would overstate the finding. Three of the eight are well substantiated and carry documented substitutes or vendor commitments: Adobe Acrobat Pro on both Credit Bureau Maintenance and back-office journals has multiple named alternate tools, and MS Teams on branch support has telephone and email as documented substitutes. Two more — Silverlake Explorer and General Ledger - G/L on their respective functions — carry vendor service level agreements with vendor-supplied attestations, so the zero represents a tight but evidenced commitment.

The three that warrant attention are of a different character. Synergy accounts for two of them, on Loan Rate Changes and on Provide branch support for loan accounts. Synergy is classified at the Critical tier, its recovery time frame is sourced from an internal line-of-business service level agreement rather than a vendor commitment, and its Time Frame Validation field is empty — the only resource in the department's inventory where that field is not populated. Two dependencies therefore have no margin, resting on a recovery assumption whose validation status the record does not assert. Synergy supports four functions in total and holds the imaging evidence of who requested each transaction, which management described during the session as the approval record for posted work.

The third is TransUnion on Credit Bureau Maintenance, and it is the department's most consequential zero. The resource recovery time frame is vendor-backed, so the assumption itself is sound. The difficulty is the recovery strategy recorded alongside it: the resource carries “Contact Vendor/Service provider, Alternate provider” as its recovery strategy, and the function's contingency detail describes escalating high-priority customer issues to management. Management stated plainly during the session that there is no alternate — disputes are submitted through e-Oscar back to TransUnion, TransUnion itself must be updated, and an outage produces delayed processing rather than redirected processing. The recorded strategy describes an option the department does not have, on the only Level 1 function in the department, in a function whose legal and regulatory impact is rated High.

### 3.4 PII and Information Protection Considerations

All eleven of the department's business functions carry a High PII disclosure impact rating. There is no differentiation anywhere in the department's portfolio, which is consistent with the nature of loan servicing work: every function touches customer account records, loan balances, payment data, or credit bureau information. It is also, from a recovery planning standpoint, a rating that carries no discriminating information — a uniform classification cannot indicate which functions warrant additional protective attention during a disruption.

The recovery implication is concrete rather than general. The documented contingency for Network/Internet on all eleven functions is relocation to a remote office, which places the handling of high-sensitivity customer data outside the primary work location for every function in the department simultaneously. Several contingency procedures compound this by directing staff to maintain tracking logs of pending items outside the systems of record — pending payoff requests, deferred rate changes, unposted mail payments, collateral release requests, and outstanding branch inquiries. These logs are precisely the artefacts that would carry customer account information outside the controlled application environment during a disruption, and the records do not specify where they are kept or how they are protected. Recovery planning for this department should treat the location, retention, and protection of those interim logs as an explicit control point.

Process mail loan payments deserves specific mention. Its Silverlake Core contingency directs staff to continue opening, validating, endorsing, and logging mailed payments while posting is deferred, with payments and supporting documentation stored securely in accordance with bank procedures. This is an appropriate operational response, and it accumulates negotiable instruments and customer payment data in physical form for the duration of an outage. The contingency references bank procedures for secure storage rather than describing them; confirming that those procedures address accumulation over a multi-day outage would close the loop.

## 3.5 Operational Resilience Assessment

### Strengths

- No negative recovery gap exists anywhere in the department, and every resource record carries populated recovery time objectives, so the gap analysis is complete and meaningful across all 37 dependencies.
- Recovery time frames are well evidenced. Five of nine resources carry vendor service level agreements with vendor-supplied attestations, and three of the remaining four are validated through internal DR testing or tabletop exercises. Eight of nine carry High recovery confidence.
- Contingency documentation is substantially complete. Thirty-five of 37 dependencies carry contingency detail that names the substitute activity and the point at which deferred work is completed, rather than asserting a strategy without describing it.
- Management engagement was substantive. The department contact identified an undocumented dependency unprompted, corrected the facilitator's proposed contingency strategy to match actual practice, supplied operational reasoning for excluding a dependency rather than a preference, and raised an unresolved question about the record without being asked.
- Criticality ratings are being actively tested rather than carried forward. The Loan Payoffs downgrade rests on a described workaround that was probed during the session, which is a stronger evidentiary basis than the rating it replaced.

### Areas Requiring Continued Monitoring

The department's concentration on a single vendor is the exposure that the current analysis does not measure. Four Jack Henry resources support all eleven functions, and while each individual dependency shows adequate headroom, no analysis in the department's records represents a disruption affecting the platform family as a whole. This is not a defect in the department's data — dependency-level gap analysis is the correct instrument for what it measures — but it means the department's most significant structural risk is invisible in the artefacts that would be produced for an examiner.

The Synergy recovery assumption should be substantiated. It is the only resource in the department whose Time Frame Validation is not recorded, it is classified Critical, it supports four functions, and it produces two of the department's eight zero-margin dependencies. It also holds the imaging record that evidences transaction authorisation, which gives an extended outage a records-integrity dimension beyond processing delay.

The TransUnion recovery strategy should be corrected to match the operational reality management described. A recorded alternate provider that does not exist is more damaging than a blank field, because it would be relied upon during an actual disruption and would be read as a validated control during an examination.

The nine functions confirmed by blanket statement should be individually reviewed in the next cycle. Silverlake Explorer was absent from a function that was reviewed in detail; management's own observation was that the same application may be missing from other functions that were not. The department's review posture this cycle was appropriate for a year with no operational change, but it is not the posture that finds a second instance of the omission this exercise uncovered.

## 3.6 BCM Maturity Assessment

Loan Servicing presents a well-maintained BCM record. Function descriptions are written in operational rather than generic terms, distinguishing for example between processing a payoff and quoting one, and between reviewing prior-day reports and generating them. Recovery time frames are populated on every resource and traceable to a stated source on every resource. Criticality ratings are differentiated across three levels and were tested rather than confirmed where they were examined.

### Contingency Documentation Completeness

Thirty-five of the department's 37 function-to-resource dependencies carry usable contingency detail. The quality of the majority is good by the standard that matters — the text names the substitute activity, identifies what is deferred, and states what happens when the resource returns, so that a member of staff who does not work in the department day to day could follow it. The Silverlake Core contingencies are consistently the strongest, distinguishing the specific activities that suspend from those that continue.

Two dependencies fall short of that standard, both on Network/Internet, for Credit Bureau Maintenance and Loan Chargeoffs. Both record only “Internet connection and VPN required for remote access,” which states a precondition for the strategy rather than describing the response. The other nine Network/Internet dependencies carry full procedures, so the shortfall is inconsistency within a single resource rather than a systematic omission.

### Contingency Text Errors Requiring Correction

Two dependencies carry contingency detail belonging to a different resource. On Provide branch support for loan accounts, the Network/Internet dependency records text that opens “If SilverLake Core is unavailable” and describes the core system response throughout; the correct network-relocation procedure does not appear on that dependency. On Loan Chargeoffs, the Adobe Acrobat Pro dependency records the Synergy contingency verbatim, closing with the instruction to complete updates “when Synergy becomes available.” Both errors appear identically in the Business Function Detail and the Threat Assessment / Incident Response extracts, which indicates a data condition in the system of record rather than a rendering artefact in either report.

These are consequential in a specific way. Contingency text is the part of the record a staff member reads during an actual disruption, and in both cases the text names a system other than the one that has failed. Both dependencies otherwise show adequate recovery headroom, so neither appears anywhere in the gap analysis as a concern.

### Contingency Strategy Alignment

One strategy label warrants review against what management described. Credit Bureau Maintenance records “Partially complete and hold” for both Silverlake Explorer and TransUnion, and the accompanying detail describes researching urgent requests using alternate records and completing verification later. Management described the response differently and unambiguously during the session, stating that nothing is entered, that there is nothing for the team to do until the software returns, and that requests remain queued in the team's email inbox. The recorded contingency describes more activity than the department performs. The text was expanded following the session rather than during it, so this is a drafting question rather than a disagreement, but it should be confirmed with the department before the next cycle.

### Record Completeness

Two systematic gaps appear in the resource inventory. The Last Reviewed field is unpopulated on all nine resources, so the record does not assert when any resource entry was last examined even though the functions themselves all carry a Last Reviewed date of September 6, 2026. Separately, the Resources in Use extract includes one resource entry rendering with no resource name, no recovery attributes and no linked business functions, positioned between Network/Internet and Silverlake Explorer in the alphabetical sequence. Its position is consistent with a workstation hardware record retained after its function links were removed in the infrastructure trim. Whether it is an orphaned record or a rendering artefact should be confirmed.

### Overall

The clearest opportunity for maturity advancement lies in three places, none of which concerns the accuracy of the department's recovery arithmetic. The first is representing vendor concentration somewhere in the department's analysis, since the dependency-level view cannot show it. The second is closing the small number of data defects identified above — two misapplied contingency texts, one recovery strategy that names an unavailable option, one unvalidated recovery time frame, and an unpopulated Last Reviewed field across the inventory. The third is procedural: returning to individual function review in the next cycle, so that the question management raised about SilverLake dependencies elsewhere in the function list can be answered.

## 3.7 Threat Assessment / Incident Response Summary

A Threat Assessment / Incident Response (TAIR) review was produced for Loan Servicing dated September 6, 2026, covering all 37 function-to-resource dependency records across the department's eleven business functions. Its finding is one of near-total absence: 36 of the 37 dependencies record “No threats currently logged for this resource,” and the single exception is an incomplete record.

| Threat ID | Subject | Recorded State |
|---|---|---|
| TH-001008 | Adobe Acrobat Pro dependency for Loan Chargeoffs | Active. Impact recorded as 3. Probability not recorded. Inherent risk 0. Residual score not recorded. Description and incident response plan both empty. |

The one logged threat is registered against Adobe Acrobat Pro on Loan Chargeoffs. It carries an impact value of 3 and an active status, and every other field is empty: no probability, no residual score, an inherent risk of zero, no description, and no incident response plan. The record establishes that the threat register is reachable and that entries can be created; it does not carry enough information to support a likelihood or impact assessment, and an inherent risk of zero against an active threat is not a meaningful risk statement.

Two observations follow from where that single record sits. It is registered against the department's least consequential dependency — a workstation PDF application with four documented alternate tools, supporting a Level 2 function with 48 hours of recovery headroom — rather than against any of the systems on which the department's operations actually rest. And it is registered against neither of the two resources that Section 3.3 identifies as carrying the department's least substantiated zero-margin dependencies.

Because no substantive threats are logged, no likelihood or impact ratings are available for the systems this department depends on, and the compounding-risk analysis that would normally close this subsection cannot be performed. Had the register been populated, the candidates for it would be identifiable from the recovery findings above: Synergy, which produces two zero-margin dependencies on an unvalidated recovery time frame; TransUnion, which produces a zero-margin dependency on the department's only Level 1 function with no substitute available; and the Jack Henry platform family, whose correlated failure is the department's principal structural exposure and is not represented in any current artefact. An unvalidated recovery assumption paired with an assessed threat likelihood is a materially stronger finding than either alone, and none of these three can presently be stated that way.

The report's present value for this department is therefore as a consolidated view of recovery parameters and contingency arrangements across all 37 dependencies, which it presents accurately. It does not yet support a judgement about incident detection or response readiness for the systems involved.

## 4. Follow-Up Tasks

The following tasks arise directly from the exercise, the September 6, 2026 BCM extracts, and the Threat Assessment / Incident Response report. Each is grounded in a specific finding described above.

| Task / Description | Owner | Priority |
|---|---|---|
| Correct the TransUnion recovery strategy to remove the alternate provider option. Management stated during the exercise that no substitute credit bureau exists — disputes are submitted through e-Oscar back to TransUnion, which must itself be updated — so an outage delays processing rather than redirecting it. The record currently describes an option the department does not have, on its only Level 1 function. | BCM Team / Loan Servicing | **High** |
| Correct the contingency detail on two dependencies where the text describes a different resource: Provide branch support for loan accounts / Network/Internet, which records SilverLake Core response text, and Loan Chargeoffs / Adobe Acrobat Pro, which records the Synergy text verbatim. Both errors are present in the system of record rather than in report rendering. | BCM Team | **High** |
| Establish and record the Time Frame Validation for Synergy, and confirm or revise its 24-hour recovery time objective. Synergy is classified Critical, supports four business functions, produces two of the department's eight zero-margin dependencies, and is the only resource in the inventory whose validation status is not recorded. | BCM Team / IT | **High** |
| Confirm the revised Loan Payoffs recovery objectives (48 / 24 / 96) with department management. The criticality downgrade from Level 1 to Level 2 was decided during the session, but the specific hour values were established afterward and have not been put back to the department. | BCM Team / Loan Servicing | **High** |
| Answer the question management raised during the exercise: determine whether Silverlake Explorer, or other SilverLake applications, should be recorded as dependencies of business functions beyond Credit Bureau Maintenance. The application was in continuous use and undocumented on the one function reviewed in detail; nine functions were not individually reviewed this cycle. | BCM Team / Loan Servicing | **High** |
| Represent the Jack Henry & Associates concentration in the department's risk analysis. Four of nine resources are supplied by one vendor and together support all eleven business functions; the dependency-level gap analysis assesses each separately and cannot show a correlated platform disruption. | BCM Team | **Medium** |
| Create third-party service provider records for TransUnion and Microsoft. TransUnion is classified as an external provider service with a vendor-sourced recovery time frame and no service provider record; Microsoft supplies both MS Office and MS Teams and is likewise unrecorded. | BCM Team / Vendor Management | **Medium** |
| Confirm the Credit Bureau Maintenance contingency text with the department. The record describes researching urgent requests using alternate sources and completing verification later; management described holding all work with nothing to enter until the system returns. The text was drafted after the session and | BCM Team / Loan Servicing | **Medium** |

| Task / Description | Owner | Priority |
|---|---|---|
| states more activity than the department performs. | | |
| Populate the threat register for this department's resources. Thirty-six of 37 dependencies record no logged threats, and the single entry (TH-001008) carries no probability, no residual score, no description and no incident response plan. Recovery strategies are documented without an assessment of what would trigger them, and no likelihood or impact rating exists to prioritise them against each other. | BCM Team | **Medium** |
| Populate contingency detail on the two Network/Internet dependencies for Credit Bureau Maintenance and Loan Chargeoffs, which record only that an internet connection and VPN are required rather than describing the response. The other nine Network/Internet dependencies carry full procedures. | BCM Team / Loan Servicing | **Medium** |
| Record the rationale for excluding generic bank-wide infrastructure — workstation hardware, telephony, and email — from departmental interdependency lists, at program level rather than department level. The exclusion is deliberate and defensible but is currently evidenced only by the absence of entries. | BCM Team | **Medium** |
| Specify where interim tracking logs are held and how they are protected during a disruption. All eleven functions are rated High for PII disclosure impact, and several contingencies direct staff to maintain logs of pending items outside the systems of record while relocated to a remote work location. | Loan Servicing / Information Security | **Medium** |
| Confirm that secure storage procedures for mailed loan payments address accumulation across a multi-day outage. The Process mail loan payments contingency directs staff to continue opening, endorsing and logging payments while posting is deferred, referencing bank procedures without describing them. | Loan Servicing | **Low** |
| Populate the Last Reviewed field on the department's nine resource records. All nine are unpopulated while all eleven business functions carry a Last Reviewed date of September 6, 2026. | BCM Team | **Low** |
| Confirm the disposition of the resource entry appearing in the Resources in Use extract with no name, recovery attributes, or linked business functions, positioned between Network/Internet and Silverlake Explorer. Its position is consistent with a workstation hardware record retained after the infrastructure trim removed its function links. | BCM Team | **Low** |
| Distinguish the Network/Internet contingency between a site-level disruption and an enterprise connectivity failure. Relocation to a remote office is recorded on all eleven functions and itself requires network connectivity and VPN access. | BCM Team / IT | **Low** |

## 5. Conclusion

The Business Impact Analysis exercise conducted with Loan Servicing on August 20, 2026 met its objectives. All eleven business functions assigned to the department were accounted for, the department's function list was confirmed complete, the two functions carrying the highest criticality ratings were reviewed in detail, the resource and third-party dependency inventory was refreshed, and the resulting changes were entered into the BCM system of record and reflected in extracts dated September 6, 2026. The session additionally established Loan Settlement as a distinct department, addressed in a companion report.

The department's record is in good condition. Every resource carries a populated recovery time objective, so the gap analysis is complete across all 37 function-to-resource dependencies and no negative gap exists anywhere in the department. Recovery time frames are well evidenced: five of nine resources rest on vendor service level agreements with vendor-supplied attestations, three more are validated through internal DR testing or tabletop exercises, and eight of nine carry High recovery confidence. Contingency documentation is substantially complete, with 35 of 37 dependencies describing the substitute activity and the point at which deferred work resumes rather than asserting a strategy without explaining it. These are the attributes an examiner looks for, and the department has them.

The most consequential finding of the exercise is a dependency that was missing rather than a gap that was measured. Credit Bureau Maintenance is the department's only Level 1 function and the only function rated High for both reputation and legal or regulatory impact, and it was documented without reference to Silverlake Explorer, the application through which the work is performed. The application was in continuous use throughout. It was surfaced because the facilitator proposed narrowing the interdependency list and management responded by naming the software the team actually uses, and it is now recorded with a vendor-backed recovery time frame. The finding does not close cleanly: management observed that the same application may be absent from other functions where it applies, and the nine functions that were confirmed by blanket statement rather than individual review this cycle are exactly where a second instance would sit undetected.

Two data defects warrant correction ahead of the next cycle, both concerning text that would be read during an actual disruption. Two dependencies carry contingency detail belonging to a different resource — the branch support network dependency describes the core system response, and the Loan Chargeoffs Adobe dependency reproduces the Synergy procedure verbatim — and both appear identically in the Business Function Detail and TAIR extracts, indicating a condition in the system of record. Separately, TransUnion carries a recovery strategy naming an alternate provider, while management stated during the session that no substitute credit bureau exists and that an outage delays processing rather than redirecting it. A recorded option that the department does not have is more damaging than a blank field, because it would be relied upon in an incident and read as a validated control in an examination.

The department's principal structural exposure is not visible in any of its current artefacts. Four of nine resources — Silverlake Core, Silverlake Explorer, General Ledger - G/L (Silverlake), and Synergy — are supplied by Jack Henry & Associates, and together they support all eleven business functions. Assessed individually, each dependency is satisfactory: the commitments are vendor-attested and every one shows recovery headroom. Assessed together, they are not four independent relationships, and a disruption to the platform family would not respect the boundaries the dependency-level analysis draws between them. The gap analysis is the correct instrument for what it measures and cannot measure this; representing the concentration somewhere in the department's records would close a distance between what the analysis shows and what the department is actually exposed to.

Three further items shape the department's near-term work. Synergy is the only resource whose Time Frame Validation is unrecorded, it supports four functions, it produces two of the department's eight zero-margin dependencies, and it holds the imaging evidence of transaction authorisation. The revised Loan Payoffs recovery objectives were set after the session and have not been confirmed with management, which leaves a downgraded function carrying values the department has not seen. And the Threat Assessment / Incident Response report records no substantive threats: 36 of 37 dependencies carry none, and the single entry is registered against the department's least consequential dependency with no probability, residual score, description or response plan recorded.

Overall, Loan Servicing maintains an accurate, well-evidenced and actively managed BCM record, supported by management that identified an undocumented dependency unprompted, corrected the facilitator's proposed contingency to match actual practice, and supplied operational reasoning rather than preference when asked to justify an exclusion. The follow-up actions identified in this report are concentrated in correction and validation rather than in construction: fixing three data defects, substantiating one recovery assumption, confirming one set of revised objectives, extending one dependency question across the function list, and populating a threat register that would allow the department's recovery findings to be weighed against assessed likelihood. On the strength of the current record and management's demonstrated engagement, Loan Servicing is assessed as examiner-ready, with the items above representing the department's path to a fully substantiated recovery posture.