Replaced by Comptroller's Handbook - Corporate and Risk Governance

Management Assessment

One of the most important examination objectives is to evaluate the quality and effectiveness of management. The success or failure of almost every facet of operations relates directly to management. Assessments of the various areas under review during an examination all reflect ultimately on the effectiveness of management. Among other things, management is responsible for:

- Implementing board established policies and strategic goals.
- Identifying and managing risk through an effective risk management function.
- Ensuring an effective system of internal controls and management reporting.
- Ensuring the adequacy and depth of resources.
- Ensuring compliance with laws and regulations.
- Ensuring the overall safe and sound operation of the institution.

In this Section, management refers to executive officers, such as chief executive officer, president, vice presidents, chief financial officer, treasurer, controller, secretary or any other person, including division managers, who have the ability, with or without explicit authority, to implement and interpret the association's strategic goals and policies.

LINKS
Program
Questionnaire

In evaluating management, you should consider the knowledge, skills, and abilities of the executive officers, their track record, regulatory compliance, and financial performance of the institution. Sound compliance management is a major consideration when evaluating the quality and effectiveness of the board and management. An effective compliance management function should include a process for assessing and monitoring compliance performance, training, and for implementing corrective action based on identified deficiencies. You should consider determinations made in each of the core examination areas (Capital, Asset Quality, Earnings, Liquidity, Sensitivity, Compliance) in your overall assessment of management.

The management rating for a given examination clearly reflects all of the examination findings in a comprehensive examination as well as:

- A demonstrated willingness and ability to serve the banking needs of the community
- Avoidance of conflicts of interest and usurpation of corporate opportunity
- Good corporate governance
- Responsiveness to recommendations for corrective action
- Risk management and financial performance
- Compliance management.

EFFECTIVENESS OF MANAGEMENT

Assessing management performance involves more than noting whether an association is profitable. Effective management requires the cooperation and active involvement of both management and the board of directors. The board should provide the guidelines, and management should make operating decisions consistent with the guidelines. You must judge management performance on the basis of how well management uses available resources to accomplish the association's objectives.

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Evaluations of management provide indicators of future operations; in some instances they may reveal a need for preventive supervision. For associations experiencing problems, evaluations are necessary to determine the capabilities of management so that you may initiate appropriate supervisory action.

OTS has determined that inefficient, incompetent, or dishonest management are the principal causes for the problems of most troubled associations. Although there are many other reasons (high expenses, poor lending practices, high delinquencies, and so on), most of the causes ultimately relate to management deficiencies.

In reviewing executive officers' performance, you need to determine that the following conditions exist:

- Sound corporate governance polices including conflict of interest and corporate opportunity policies.

- Sound and consistent objectives, policies, and procedures in the asset, liability, and operational areas, including information technology and customer information security.

- The timely identification, assessment, and mitigation of risk.

- The ability, knowledge, and attitude to manage compliance responsibilities.

- Personnel throughout the association adhere to policies and receive training ensuring clear communication of relevant legal and regulatory requirements, and procedural guidelines.

- A strong system of internal controls, including technology risk controls.

- Management information systems facilitate efficient operation and ensure effective communications and monitoring of activities.
- The association's planning processes facilitate achievement of goals and objectives. The planning process includes business continuity and disaster recovery.
- Senior management delegates appropriate authorities to middle management and staff personnel.
- Management's experience and depth ensures sound decisions and assures continuity of operations.
- Management is capable of handling situations the association may reasonably encounter in the future.
- Track record, including track record in remedying previously identified problems.

Risk Management

Risk management—that is the timely identification, assessment, and mitigation of risk—is an integral part of management's responsibilities. An effective risk-management framework identifies potential events that may affect the institution and establishes how an institution will manage its risk given its risk appetite and strategic direction. A risk management program should be consistent with the size, complexity, and risk profile of an association.

In evaluating risks, managers need to consider both current and planned or anticipated operational and market changes and identify the risks arising from those changes. Once risks have been identified, assessed and evaluated as to their potential impact on the organization, management must determine the effectiveness of controls and develop and implement additional appropriate mitigating controls where needed. The effectiveness of those controls should be evaluated independently of the group that develops the controls.

Traditional risk management has focused on quantifiable risks, such as credit and market risks. Recent events have demonstrated the need for greater focus on the risks that are harder to quantify—that is, operational, legal, and reputation risks. A strong regulatory compliance program is an integral part of the risk-management function. The compliance area is critical to identifying, evaluating, and addressing legal and reputation risks, particularly in complex financial firms.

Safety and Soundness and Compensation Standards

Appendix A of 12 CFR Part 570, entitled Interagency Guidelines Establishing Standards for Safety and Soundness, sets forth operational and managerial standards for insured associations to follow with respect to the following activities and practices:

- Internal controls and information systems (includes controls and systems for compliance)
- Internal audit systems
- Loan documentation
- Credit underwriting
- Interest rate exposure
- Asset growth
- Asset quality
- Earnings
- Compensation, fees, and benefits.

The compensation guidelines require associations to maintain safeguards to prevent the payment of compensation, fees, and benefits that are excessive or that could lead to material financial loss to the association.

Appendix B of 12 CFR Part 570, entitled Interagency Guidelines Establishing Standards for Customer Information, sets forth administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of customer information. An association must:

- Implement a board-approved, written information security program.
- Conduct and document a risk assessment of customer information security.
- Require in contracts that service providers implement security programs designed to meet the objectives of this section.
- Monitor, evaluate, and adjust for changes within the association.
- Report to the board annually on the association's compliance and status of the program.

The compensation guidelines require associations to maintain safeguards to prevent the payment of compensation, fees, and benefits that are excessive or that could lead to material financial loss to the association. The guidelines define compensation to be excessive when it is unreasonable or disproportionate to the services that an executive officer, employee, director or principal shareholder performs, in consideration of the following factors:

- The combined value of all cash and non-cash benefits provided to the individual.
- The compensation history of the individual and other individuals with comparable expertise at the association.

- The financial condition of the association.
- Comparable compensation practices at comparable associations.
- For post-employment benefits, the projected total cost and benefit to the association.
- Any connection between the individual and any fraudulent act or omission, breach of trust or fiduciary duty, or insider abuse with regard to the association.
- Any other factors the federal banking agencies determine to be relevant.

Section 570.2(b) provides that if OTS determines that an association fails to meet a safety and soundness standard, OTS may request the submission of a safety and soundness compliance plan.

Regulatory Bulletin 27b provides compensation provision guidance and clarifies OTS policy about unsafe and unsound practices relating to executive compensation and employment contracts.

Compliance Management Program

Sound compliance management, like other areas of operations management is predicated on establishing a comprehensive program of risk controls, periodic reviews, and self-assessments. Actively managing compliance risk starts at the board of directors' level through senior and middle management down to staff personnel.

Your assessment of management's performance in compliance management should focus on their compliance management program and how well it addresses components the agency expects in a comprehensive program: systems, monitoring, assessment, accountability, response, and training (SMAART components).

In assessing the board and management performance in compliance management, consider the following factors:

- Management allocates sufficient resources for the implementation of a formal written compliance program tailored to its size, organizational structure, business strategy, complexity of operations, market products offered, and staff expertise. The program should:
  - — Emphasize the importance of regulatory compliance as an inherent part of business operations.
  - — Establish standards of accountability for all personnel charged with compliance-related responsibilities.
  - — Include the means for the board and management to actively assess compliance performance.

- The compliance management program provides for and results in:
  - — Comprehensive policies and procedures, and the systems to implement them.
  - — Internal controls that afford ongoing monitoring to ensure transactions are executed in accordance with program standards.
  - — Periodic reviews of systems records and operations to identify transactional violations and program deficiencies.
  - — Prompt correction of compliance violations or deficiencies identified during ongoing monitoring, the internal review process or in response to consumer complaints.
  - — An ongoing comprehensive training program that ensures the clear communication of relevant legal and regulatory requirements, and the association's procedural guidelines to all affected officers and staff personnel.

Internal Controls

Both the directors and senior management have important roles in an association's programs of internal control, loan review, internal audit, and compliance management. Although directors have overall audit responsibility and should require that the auditor report directly to them, directors normally charge senior management with the duty of developing and maintaining a strong system of internal controls, including technology risk controls, and a formal compliance management program. Relying on the independent auditors to establish the association's internal controls is inappropriate. Senior management is responsible for the design and implementation of effective controls to prevent errors, conflict of interest situations, and fraud. Refer to Sections 340, 341, 355, and 360 of the Examination Handbook.

Management Information Systems

An effective management information system (MIS) contains information from a number of sources. Such information must serve a number of users, each having varying needs. The MIS must selectively update information from all available sources and coordinate it into meaningful and clear formats. You can determine the effectiveness of MIS on the basis of the following measurements:

- **Quality.** This relates to the relevance and accuracy of the information. Poor quality information usually stems from inadequate controls, analysis, and evaluations of information needs, or from ineffective design of reports.
- **Quantity.** Too many reports or too much information on a single report may hamper or discourage their use completely. Too little information may reflect insufficient analysis of information needs.

- **Timeliness.** The improper design of information processes and the failure to identify the frequency of need for information usually causes untimely processing and distribution of information.

Prompt Corrective Action

Undercapitalized and significantly under-capitalized associations that fail to submit and implement an acceptable capital restoration plan are subject to the prompt corrective action provisions of § 38(f)(2)(F) of the FDIA. That section permits OTS to dismiss any director or senior executive officer that held office for more than 180 days immediately before under-capitalization. The section also requires the association to employ qualified senior executive officers. Section 38(i)(2)(f) of the statute requires OTS to take action to prohibit critically undercapitalized associations from paying excessive compensation or bonuses.

Also, the prompt corrective action provisions of OTS regulation 12 CFR §565.6(a) impose restrictions on management fees and senior executive officer compensation. Undercapitalized, significantly undercapitalized, and critically undercapitalized savings associations are subject to the management fee provisions of § 38(d) of the FDIA. Significantly undercapitalized and critically undercapitalized associations are subject to the senior executive officer compensation provisions of § 38(f)(4).

Section 38(d)(2) of the FDIA prohibits associations from paying a management fee to any person having control of the association if after the payment the association would be undercapitalized. Section 38(f)(4) provides that undercapitalized or significantly undercapitalized associations that fail to submit and implement an acceptable capital restoration plan shall not do either of the following without prior OTS approval:

- Pay a bonus to a senior executive officer.

- Compensate a senior executive officer at a rate exceeding the officer's average rate of compensation for the year prior to the month when the association became undercapitalized.

Notice of Change of Senior Executive Officers

OTS regulations 12 CFR § 563.550 through § 563.590 require capital deficient or troubled savings associations to notify OTS 30 days before taking either of the following actions:

- Employing a senior executive officer.

- Changing the responsibilities of any senior executive officer so that the person would assume a different senior executive position.

The same regulatory notice requirement also applies to savings and loan holding companies in a troubled condition.

Capital deficient associations meet one of the following conditions:

- Do not comply with all minimum capital requirements.

- OTS notifies the association, in connection with their capital restoration plan, that it must file a notice.

OTS will disapprove a notice if, based on the competence, experience, character, or integrity of the proposed senior executive officer, that it would not be in the best interests of the depositors or the public to permit the association to employ the individual.

PLANNING

Sound planning is fundamental to effective management and is a key to anticipating and dealing with rapid change, and managing risk. Senior management and the board of directors should inventory the association's resources, examine changes in its operations, monitor changes in external factors, including legislative, regulatory, industry and, market conditions on its compliance program, and determine its responses to those changes. To be effective, planning should be dynamic in nature. The savings association should carefully monitor and support the planning function. Management must revise projections periodically as circumstances change and the board formulates new strategies to meet stated objectives.

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Planning requires the collection and coordination of large amounts of information and the thoughtful efforts of all members of the management team. Written plans help ensure that the board of directors, executive officers, and all division managers within the association share the same goals, objectives, and strategies. A common and shared perception of future actions is critical to the execution of a successful plan.

Any of the following management failures warrants the attention of the association's directors. You should accordingly note such failures in the report of examination:

- Lack of a satisfactory strategic and operational planning process.

- Failure to develop a comprehensive, association-wide business continuity plan.

- Lack of adherence to plans.

- Ineffective monitoring and control of plans.

- Failure to adjust existing plans to recognize and conform to changing economic and market conditions, legislative and regulatory requirements.

You should also be alert, particularly with respect to new associations, for any deviations to strategic or operational plans that may be potentially detrimental to the association. Such deviations, which you should also note in the report of examination when assessing management performance, include the following examples:

- The excessive use of or reliance on brokered deposits.
- The initiating of new, novel, or higher risk lending, investment programs, or new technology without appropriate planning, expertise, or controls.
- The failure to independently and adequately investigate and document extensions of credit, particularly those made outside an association's normal lending territory.
- The willingness to forgo long-term stability in favor of short-term profits.
- Many newly chartered savings associations are subject to approval conditions, usually contained in the director's order. You should carefully review the association's adherence to these conditions.

The Planning Process

To be effective, planning requires a structure and a process. Planning can be segmented into two categories: **strategic** and **operational**. Strategic planning focuses on the long-term, extensive allocation of resources to achieve corporate goals and objectives. Operational planning, such as a business plan, concentrates on shorter-term actions designed to implement those strategies outlined in the strategic planning process. For an effective planning process, the operational plans must flow logically from the strategic plan.

Management Succession

You should evaluate the association's quality of plans for maintaining its present condition and for improving its future condition. This should include an evaluation of the board and management's efforts to provide for succession of senior officers.

The projection of future management needs involves an appraisal of the quality and quantity of senior and middle management. This assessment must be relative to the size, complexity, and market circumstances of the association. Determination of what management will do with the association in the future is most important. The supervisory goal is to prevent problems from developing rather than wait for future examinations or monitoring to identify deteriorating conditions.

Regulatory Concerns

You should not evaluate association planning with the preconception that every association should have a model planning process. You should evaluate the planning process and the plan itself. If a well-designed planning process exists, the plan will generally be thoughtful and realistic. Management's failure to have a satisfactory planning process warrants the attention of the association's directors and you should accordingly report the failure in the report of examination.

You must treat an association's strategic, operational, and business plans with maximum confidentiality. They contain sensitive information that directly affects the association's market position and financial condition.

MANAGEMENT OF HUMAN RESOURCES

People are the link between an association's organizational structure and the attainment of its organizational goals. The board of directors is responsible for employing a competent chief executive officer. Thereafter, senior management is responsible for recruiting and making certain that there are competent employees available to staff all positions. Personnel management includes establishing procedures for promoting and replacing employees, reviewing their performance, devising a system of compensation, and selecting and training future managers.

The following areas warrant your particular attention in evaluating personnel management, as they are important indicators of an association's viability:

- Detailed position descriptions and standards.
- Carefully planned recruiting and proper screening of new employees.
- Appropriate security training for protecting the association's customer information.
- Performance review and comparison to standards.
- Salary administration.
- Provision for communication.

You should determine the appropriateness of an association's employment contracts, bonus and incentive plans, salary levels, and employee benefits program. You should compare compensation paid and benefits provided with those that an appropriate peer group offers, and should determine reasons for any substantial differences.

Use of Consultants and Outsourcing

It is fairly common for savings associations to outsource certain functions of the association. Outsourcing functions can reduce operating expenses; however, associations should be careful not to rely on vendors or consultants to perform critical functions without adequate controls. These controls should include monitoring performance as it relates to products and services delivered by or performed on behalf of the association. Monitoring controls are management's first line of defense against operational risk and compliance risk. Use of a vendor or consultant does not lessen the burden on management to supervise and control the association's systems, policies, and procedures. Management must obtain complete information for vendors and consultants. This should include performing regular due diligence when retaining the services of any third-party provider, vendor or consultant. The savings association must have a written agreement with the vendor or consultant that outlines the conditions, rights, and responsibilities of each party. See Thrift Bulletin (TB) 82a, Third-Party Arrangements.

AVOIDANCE OF CONFLICTS OF INTEREST

The phrase conflict of interest refers to any situation where the safety and soundness or opportunity of an association is in conflict with the personal interests of any of the following persons:

- A director.
- An officer.
- Any other employee or person who has influence over an association's policies, procedures, or actions.

Conflicts of interest (or even the appearance of such) can compromise safe and sound operations and reputation for integrity. Conflicts can undermine public confidence in the thrift industry.

Sometimes those who owe a fiduciary duty to an association subtly disguise a conflict, making it difficult to detect. In other instances, they may openly acknowledge a conflict. Some conflicts may be detrimental while others may appear to be beneficial to the association. Where a conflict exists, however, its very appearance alone could damage an association's image. A conflict could cause a financial loss to an association if the individual involved considers self-interest and personal gain more important than an association's interests.

Management has a fiduciary responsibility to avoid any conflicts of interest or appearance of conflict of interest. Personal affiliations should not be incompatible with those of the association. Furthermore, when both of the following circumstances exist, no officer should take advantage of a business opportunity for his or her own or another person's personal benefit:

- The opportunity is within the corporate powers of an association or its service corporation(s).
- The opportunity is of present or potential advantage to the association.

> Management has a fiduciary responsibility to avoid any conflicts of interest or appearance of conflict of interest.

You should review the association's formal policy for avoidance of conflict of interest situations. The policy at a minimum should address the following concerns:

- Areas where conflicts of interest and usurpations of corporate opportunity could arise. This includes transactions involving the association and persons related to directors or officers, or transactions for their benefit.

- Controls that the association maintains to avoid abuses and the procedures in place for dealing with policy violations.

- Business activities in which the association's directors and senior management are active.

- Business activities that the law permits the association to conduct.

- A specific plan for dealing with conflicts of interest and corporate opportunity problems in these areas.

You should determine if directors and officers are complying with the policy. Accordingly, you should comment on and take appropriate action on any actual or apparent conflict of interest transactions that adversely affect the association, even though an OTS regulation may not specifically address the conflict. Also, you should include comment, and supervisory objection taken, whenever any person involved in the conflict participates in the approval of the subject transaction.

Loans to Executive Officers

You should have knowledge of Federal Reserve Board Regulation O, 12 CFR Part 215, and OTS regulation 12 CFR § 563.43. Regulation O governs member bank extensions of credit to executive officers, directors, and principal shareholders. Section 563.43 applies the Regulation O restrictions to savings associations. See Examination Handbook Section 380, Transactions with Affiliates and Insiders.

Management Questionnaire

The Preliminary Examination Response Kit (PERK) Management Questionnaire is an important and useful tool in determining objectives and strategies for conducting an examination. In this regard, much of the information that the questionnaire asks for may provide leads in determining the existence of possible conflict of interest situations or transactions. The Management Questionnaire deals with transactions or arrangements with affiliates or affiliates persons, tie-in arrangements, and ownership and control concerns.

You must satisfy yourself as to the completeness and accuracy of responses to the Management Questionnaire, and must follow up on and report any inconsistencies between the responses and your examination findings.

RESPONSE TO SUPERVISION

You must determine the association's compliance with conditions of approval, orders, supervisory agreements, and directives. Supervisory authorities look to management to implement corrective action in response to directors' requests and regulatory supervision requirements. Management should establish procedures to ensure continuing compliance. Corrective action must be responsive to the cited criticism and implementation of appropriate action must be timely. Management must explain any noncompliance with supervisory requirements, including plans for corrective action.

If management or the board of directors continues to operate in an unsafe and unsound manner, supervision may have to initiate formal enforcement action. See Examination Handbook Section 370, Enforcement Actions. Your regional Confidential Individual Information System (CIIS) administrator should record the inclusion of any formal enforcement action against an individual in CIIS. The following are some other types of management or director's actions that your CIIS administrator should record in CIIS:

- Criminal referrals.
- Referrals to a professional group for disciplinary purposes.
- Significant business transactions between an association and an individual that raises supervisory concern.

You should contact your regional CIIS administrator for guidance as to whether a particular event warrants an individual's inclusion in CIIS.

Fidelity Bonds and Directors' and Officers' Liability Insurance

Fidelity Bonds

Fidelity bond coverage insures against losses attributable to dishonest acts. Directors' and officers' liability insurance covers losses attributable to negligent acts.

Under 12 CFR § 563.190, Bonds for Directors, Officers, Employees, and Agents; Form of and Amount of Bonds, associations must maintain bond coverage. Coverage must be in an amount that each association determines to be safe and sound in view of the association's potential exposure to risk. In assessing the adequacy of such coverage, management and the board of directors should at a minimum consider the following factors:

- The size of the association's asset portfolio and deposit base.
- An overall assessment of the effectiveness of the association's internal operating controls.
- The amount of cash, securities, and other property that the association normally holds.
- The number of the association's employees, their experience, levels of authority, and turnover rate.

- The extent that the association conducts trust powers.
- The range and scope of information technology activities.
- The extent of coverage that a holding company fidelity bond or other affiliated entity provides.

Paragraph (d) of 12 CFR §563.190 requires the board of directors to review the association's bond coverage at least annually to assess the continuing adequacy of coverage.

During the examination process you are to review the record of management's assumptions, analyses, and conclusions in its determination as to the appropriate form and levels of coverage.

OTS regulations do not require fidelity bond coverage under a specific standardized form. Bond coverage must include each director, officer, employee, and agent who has control over or access to cash, securities, or other property of the association. The board of directors of each association must formally approve the association's coverage, including any endorsements, riders, or other forms of coverage that may supplement the insurance underwriter industry's standard forms.

In addition, an association doing business with a stockbroker must ensure that the stockbroker has Stockbroker's Blanket Bond protection. This protection covers the firm's employees that handle the property of clients. The association should keep a copy of the bond in its files.

For various reasons, such as insufficient levels of regulatory capital, some associations have difficulty in obtaining bond coverage. Supervisory discretion is permissible in these instances when an association documents evidence of its attempts to obtain coverage. The association should notify the regional director of its efforts to obtain such coverage.

An association's periodic review of internal and external logical and physical security measures and controls is appropriate in every association. Refer to Section 341 of the Examination Handbook, and the Examination Handbook Section on the Bank Protection Act. Such review is especially appropriate in an association that is operating without adequate bond coverage. Ideally, an association should undertake this effort as a special project, with responsibility assigned to a particular executive officer. The project should include such matters as the following:

- A thorough review of the association's existing programs.
- The design and implementation of additional security procedures and controls.
- A formal report to the board of directors. The board's minutes should note the board's resulting action.

D & O Liability Insurance

In addition to fidelity bond coverage, many associations obtain directors' and officers' (D&O) liability insurance. D&O insurance protects directors and officers against personal liability for losses that a third party incurred due to a director or officer's negligent performance.

There is no regulatory requirement that an association maintain D&O insurance. A federal association may self-indemnify directors and officers.

REFERENCES

United States Code (29 USC)

§ 201	Fair Labor Standards Act of 1938
§ 206	Equal Pay Act of 1963
§ 621	Age Discrimination in Employment Act of 1967
§ 651	Occupational Safety and Health Act of 1970
§ 1001	Employee Retirement Income Security Act of 1974

United States Code (42 USC)

§ 2000e	Title VII of the Civil Rights Act of 1964 (Equal Employment Opportunity)

Code of Federal Regulations (12 CFR)

Federal Reserve Board Regulations

Part 215	Regulation O, Loans to Executive Officers, Directors, and Principal Shareholders of Member Banks

OTS Regulations

§ 528.7	Nondiscrimination in Employment
§ 545.121	Indemnification of Directors Officers and Employees
§ 552.6-2	Officers
§ 561.35	Officer
§ 563.33	Directors, Officers, and Employees

§ 563.39	Employment Contracts
§ 563.41	Loans and Other Transactions with Affiliates and Subsidiaries
§ 563.43	Loans by Savings Associations to Their Executive Officers, Directors and Principal Shareholders
§ 563.161	Management and Financial Policies
§ 563.180	Suspicious Activity Reports and Other Reports and Statements
§ 563.181	Reports of Change in Control of Mutual Savings Associations
§ 563.183	Reports of Change in Chief Executive Officer or Director
§ 563.190	Bonds for Directors, Officers, Employees, and Agents; Form of and Amount of Bonds
§ 563.191	Bonds for Agents
§ 563.200	Conflicts of Interest
§ 563.201	Corporate Opportunity
§ 563.550	Notice of Change of Director or Senior Executive Officer
Part 563f	Management Official Interlocks
§ 565.6	Mandatory and Discretionary Supervisory Actions under Section 38
Part 568	Bank Protection Act
Part 570	Interagency Guidelines Establishing Standards for Safety and Soundness, Appendix A and B

Office of Thrift Supervision Guidance

CEO Memos

CEO 133	Risk Management of Technology Outsourcing

Regulatory and Thrift Bulletins

RB 20	Proper Investigation of Applicants and Increased Communications Between OTS and Other Financial Association Regulatory Agencies

RB 27b	Compensation
TB 81	Interagency Policy Statement on the Internal Audit Function and Its Outsourcing
TB 82a	Third Party Arrangements

Handbook References

Section 1100	Compliance Oversight Examination Program