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System and Organization Controls Report SOC 1® Type 2

Report on the Description of a Service Organization's System and the Suitability of the Design and Operating Effectiveness of Controls

Related to the SmartCall and SmartCECL Applications

For the Period October 1, 2024 to September 30, 2025

FEDREPORTER

This report is intended solely for the information and use of Fed Reporter, user entities of Fed Reporter's SmartCall and SmartCECL Applications, and their auditors. This report is not intended to be, and should not be, used by anyone other than the specified parties.

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SECTION I: Independent Service Auditor's Report

INDEPENDENT SERVICE AUDITOR'S REPORT

To Fed Reporter, Inc.

Scope

We have examined Fed Reporter, Inc.'s (Fed Reporter or service organization) description of its SmartCall and SmartCECL Applications entitled "System Description Provided by Fed Reporter, Inc." for assisting clients in call reporting as well as calculating the Allowance for Credit Losses (ACL) on AMOC Financing Receivables (Loans), Net Investment in Leases, and Unused Commitments throughout the period October 1, 2024 to September 30, 2025, (description) and the suitability of the design and operating effectiveness of the controls included in the description to achieve the related control objectives stated in the description, based on the criteria identified in "Assertion of Fed Reporter, Inc.'s Management" (assertion). The controls and control objectives included in the description are those that management of Fed Reporter believes are likely to be relevant to user entities' internal control over financial reporting, and the description does not include those aspects of the SmartCall and SmartCECL Applications that are not likely to be relevant to user entities' internal control over financial reporting.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Fed Reporter's controls are suitably designed and operating effectively, along with related controls at the service organization. Our examination did not extend to such complementary user entity controls, and we have not evaluated the suitability of the design or operating effectiveness of such complementary user entity controls.

Service Organization's Responsibilities

In Section II, Fed Reporter has provided an assertion about the fairness of the presentation of the description and suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description. Fed Reporter is responsible for preparing the description and assertion, including the completeness, accuracy, and method of presentation of the description and assertion, providing the services covered by the description, specifying the control objectives and stating them in the description, identifying the risks that threaten the achievement of the control objectives, selecting the criteria stated in the assertion, and designing, implementing, and documenting controls that are suitably designed and operating effectively to achieve the related control objectives stated in the description.

Service Auditor's Responsibilities

Our responsibility is to express an opinion on the fairness of the presentation of the description and on the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether, in all material respects, based on the criteria in management's assertion, the description is fairly presented and the controls were suitably designed and operating effectively to achieve the related control objectives stated in the description throughout the period October 1, 2024 to September 30, 2025. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

An examination of a description of a service organization's system and the suitability of the design and operating effectiveness of controls involves:

- Performing procedures to obtain evidence about the fairness of the presentation of the description and the suitability of the design and operating effectiveness of the controls to achieve the related control objectives stated in the description, based on the criteria in management's assertion.
- Assessing the risks that the description is not fairly presented and that the controls were not suitably designed or operating effectively to achieve the related control objectives stated in the description.
- Testing the operating effectiveness of those controls that management considers necessary to provide reasonable assurance that the related control objectives stated in the description were achieved.
- Evaluating the overall presentation of the description, suitability of the control objectives stated in the description, and suitability of the criteria specified by the service organization in its assertion.

Inherent Limitations

The description is prepared to meet the common needs of a broad range of user entities and their auditors who audit and report on user entities' financial statements and may not, therefore, include every aspect of the system that each individual user entity may consider important in its own particular environment. Because of their nature, controls at a service organization may not prevent, or detect and correct, all misstatements in processing or reporting transactions. Also, the projection to the future of any evaluation of the fairness of the presentation of the description, or conclusions about the suitability of the design or operating effectiveness of the controls to achieve the related control objectives, is subject to the risk that controls at a service organization may become ineffective.

Description of Tests of Controls

The specific controls tested and the nature, timing, and results of those tests are listed in Section IV.

Opinion

In our opinion, in all material respects, based on the criteria described in Fed Reporter's assertion:

a. the description fairly presents Fed Reporter's SmartCall and SmartCECL Applications that were designed and implemented throughout the period October 1, 2024 to September 30, 2025.
b. the controls related to the control objectives stated in the description were suitably designed to provide reasonable assurance that the control objectives would be achieved if the controls operated effectively throughout the period October 1, 2024 to September 30, 2025, and the user entities applied the complementary controls assumed in the design of Fed Reporter's controls throughout the period October 1, 2024 to September 30, 2025.
c. the controls operated effectively to provide reasonable assurance that the control objectives stated in the description were achieved throughout the period October 1, 2024 to September 30, 2025, if complementary user entity controls assumed in the design of Fed Reporter's controls operated effectively throughout the period October 1, 2024 to September 30, 2025.

Restricted Use

This report, including the description of tests of controls and results thereof in Section IV, is intended solely for the information and use of Fed Reporter, user entities of Fed Reporter's SmartCall and SmartCECL Applications during some or all of the period October 1, 2024 to September 30, 2025, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by user entities themselves, when assessing the risks of material misstatement of user entities' financial statements. This report is not intended to be, and should not be, used by anyone other than the specified parties.

Crowe LLP

West Hartford, Connecticut
October 31, 2025

SECTION II: Assertion of Fed Reporter, Inc.'s Management

October 31, 2025

Assertion of Fed Reporter, Inc.'s Management

We have prepared the description of Fed Reporter, Inc.'s (Fed Reporter or service organization) SmartCall and SmartCECL Applications entitled, "System Description Provided by Fed Reporter, Inc." for assisting clients in call reporting as well as calculating the Allowance for Credit Losses (ACL) on AMOC Financing Receivables (Loans), Net Investment in Leases, and Unused Commitments throughout the period October 1, 2024 to September 30, 2025 (description), for user entities of the system during some or all of the period October 1, 2024 to September 30, 2025, and their auditors who audit and report on such user entities' financial statements or internal control over financial reporting and have a sufficient understanding to consider it, along with other information, including information about controls implemented by the user entities of the system themselves, when assessing the risks of material misstatement of user entities' financial statements.

The description indicates that certain control objectives specified in the description can be achieved only if complementary user entity controls assumed in the design of Fed Reporter's controls are suitably designed and operating effectively, along with related controls at the service organization. The description does not extend to controls of the user entities.

We confirm, to the best of our knowledge and belief, that

a. the description fairly presents the SmartCall and SmartCECL Applications made available to user entities of the system during some or all of the period October 1, 2024 to September 30, 2025 for assisting clients in call reporting as well as calculating the Allowance for Credit Losses (ACL) on AMOC Financing Receivables (Loans), Net Investment in Leases, and Unused Commitments as it relates to controls that are likely to be relevant to user entities' internal control over financial reporting. The criteria we used in making this assertion were that the description

   i. presents how the system made available to user entities of the system was designed and implemented to process relevant user entity transactions, including, if applicable,

      (1) the types of services provided, including, as appropriate, the classes of transactions processed.

      (2) the procedures, within both automated and manual systems, by which those services are provided, including, as appropriate, procedures by which transactions are initiated, authorized, recorded, processed, corrected as necessary, and transferred to the reports and other information prepared for user entities of the system.

      (3) the information used in the performance of the procedures including, if applicable, related accounting records, whether electronic or manual, and supporting information involved in initiating, authorizing, recording, processing, and reporting transactions; this includes the correction of incorrect information and how information is transferred to the reports and other information prepared for user entities.

      (4) how the system captures and addresses significant events and conditions other than transactions.

      (5) the process used to prepare reports and other information for user entities.

      (6) services performed by a subservice organization, if any, including whether the carve-out method or the inclusive method has been used in relation to them.

(7) the specified control objectives and controls designed to achieve those objectives, including, as applicable, complementary user entity controls and complementary subservice organization controls assumed in the design of the service organization's controls.

(8) other aspects of our control environment, risk assessment process, information and communications (including the related business processes), control activities, and monitoring activities that are relevant to the services provided.

ii. includes relevant details of changes to the service organization's system during the period covered by the description.

iii. does not omit or distort information relevant to the service organization's system, while acknowledging that the description is prepared to meet the common needs of a broad range of user entities of the system and their user auditors, and may not, therefore, include every aspect of the SmartCall and SmartCECL Applications that each individual user entity of the system and its auditor may consider important in its own particular environment.

b. the controls related to the control objectives stated in the description were suitably designed and operating effectively throughout the period October 1, 2024 to September 30, 2025 to achieve those control objectives if user entities applied the complementary controls assumed in the design of Fed Reporter's controls throughout the period October 1, 2024 to September 30, 2025. The criteria we used in making this assertion were that:

i. the risks that threaten the achievement of the control objectives stated in the description have been identified by management of the service organization.

ii. the controls identified in the description would, if operating effectively, provide reasonable assurance that those risks would not prevent the control objectives stated in the description from being achieved.

iii. the controls were consistently applied as designed, including whether manual controls were applied by individuals who have the appropriate competence and authority.

Fed Reporter, Inc.

SECTION III: System Description Provided by Fed Reporter, Inc.

Company Overview

Since 2009, Fed Reporter, Inc. has provided regulatory filing solutions, assisting more than 5,000 financial institutions nationwide. We support banks, credit unions, and holding companies. Fed Reporter is an independent, employee-owned company, with staff roots that stretch back to DPSC Software, the company that introduced the original FFIEC Call Report application. With locations across the United States, we are committed to offering unparalleled service and value to our customers.

SmartCall and SmartCECL Applications Overview

Fed Reporter applications are installed locally in clients' environments. This gives clients full control over access to the application and data inputs. Internally, Fed Reporter maintains standard security protocols to protect development environments. Reasonable access is granted to employees as is appropriate to their roles. Where access is granted, controls are in place to maintain a secure environment and are regularly reviewed.

SmartCall

SmartCall is a locally installed desktop application created to assist clients in submitting their FFIEC 031, 041, or 051 Call Report to the FDIC. Banks synchronize with the Central Data Repository (CDR) to maintain and file their quarterly reports. The software allows for both manual entry and import options. The system is updated quarterly via an FDIC taxonomy file, which includes reportability concepts, edit checks, totals and other information.

SmartCECL

SmartCECL is a locally installed desktop application created to assist clients in calculating the Allowance for Credit Losses (ACL) on AMOC Financing Receivables (Loans), Net Investment in Leases, and Unused Commitments utilizing the WARM method. Calculations are further vetted through consultants including active accountants from nationally recognized firms and a recently retired FDIC accountant to maintain CECL requirements, as defined in the FASB No. 2016-13 accounting standard update. The system can calculate the Average Remaining Life of the portfolio, prepayment rates, and unfunded draw rates. SmartCECL does not complete calculations on all items under the new requirements, thus the onus falls to the client to account for these items outside of SmartCECL. An example of excluded calculations is the ACL for Held-to-Maturity securities (HTM).

SmartCECL provides audit reports and transparency to calculations in provided documentation to allow users to validate all aspects of the ACL. Fed Reporter has implemented basic validations for data where logically appropriate.

Relevant Aspects of the Control Environment, Risk Assessment, Information and Communication, and Monitoring

Control Environment

Fed Reporter's President and Chief Operating Officer oversee operations of the organization. They provide direction and feedback to the Director of Operations who oversees the daily operations of the company's applications. Annual review of policies and procedures are completed by the leadership team and communicated to the organization. The Board of Directors will meet at least once annually to discuss the direction and general status of the organization.

Risk Assessment

Leadership meets periodically to evaluate risks to the organization. Based on these reviews, changes to the organization's internal controls or products direction may occur. As an additional precaution, Fed Reporter engages with external consultants from nationally recognized accounting firms and a recently retired FDIC accountant for any GAAP/FASB changes that may impact the application.
In our development environment, SonarQube is utilized to evaluate the company's systems for vulnerabilities and possible coding issues. The lead developer is responsible for reviewing and reporting any issues.

Information and Communication

Primary communication, both internally and externally, is via email. Internally, Fed Reporter utilizes Teams for quick communication, phone/conference tools for complex concepts and any other tool deemed viable. The organization fosters an open environment, and leadership is available at all levels to all employees.

Monitoring

Our servers are maintained by IONOS. They manage the Distributed Denial of Service defense mechanism to ensure that our hosted resources remain secure and resilient to DDoS attacks. Every time an attack is identified, the Distributed Denial of Service defense mechanism redirects all suspicious traffic to a filtering platform. There, the DDoS traffic is filtered. Only valid traffic is forwarded to your server; the rest is blocked. Additionally, server performance is monitored via an agent provided by IONOS. Included is CPU, RAM, and Storage performance. Connection speeds and port availability are also monitored.

Description of Controls

The control objectives and related controls specified by management are included in Section IV of this report; however, while in Section IV, they are an integral part of Fed Reporter' description of their SmartCall and SmartCECL Applications.

Application and Database Change Management

Control Objective 1: Controls provide reasonable assurance that the development of applications and maintenance of existing applications are documented, tested, and approved prior to being moved to production.

Fed Reporter utilizes Azure DevOps to track all product development. All program changes, including emergency changes, are required to be authorized, tested, and approved prior to deploying into production. All changes are documented and tracked within the project management and tracking system (CM.01). Tasks can be created by any user that has been granted access. These items are vetted by the Project Manager or other designated employees for acceptance in a development cycle.

As development tasks are completed, non-development staff are notified. The assigned user will review changes and complete appropriate testing of the changes. Prior to production release, a regression test is completed to confirm no unexpected changes occur to previous and current reporting periods for SmartCECL (CM.03a). For SmartCall, performance tests are completed before any changes are pushed (CM.03b). Separate development, test and production environments are in place to segregate change management activities (CM.04). As a final step, all documentation is updated, and a release log is created for client consumption. User Guides detailing changes are updated, reviewed, and distributed to end users. Other individuals review the User Guides than those who developed the change (CM.06). Additionally, SmartCall quarterly updates are reviewed, and documentation is provided to end users of these changes (CM.07).

An individual separate from developer reviews changes implemented and closes the ticket to document review of the changes implemented and ensures only changes authorized and tested were implemented (CM.05). All releases notify two non-development employees for approval. As an additional gate, a production release requires the COO to push for client consumption. If not completed, a production release would not be visible to clients for download.

A version control tool is utilized to manage and protect code integrity (CM.02).

Logical Access

Control Objective 2: Controls provide reasonable assurance that logical access to the network, production applications, operating systems and data is restricted to authorized individuals.

Fed Reporter is a lean organization where roles can and do cross. Users are only granted access to systems that are logical for their roles. Each user's access is reviewed annually or when duties change. User access is periodically reviewed to evaluate if users' access permissions align with their job duties (AC.04).

Password policies follow industry standards and are shared annually to employees via email. Password settings for authentication to DevOps are configured to comply with the corporate password policy (AC.01). Where systems support two-factor authentication, it is required to utilize.

Administrative access to production servers and databases is restricted only to authorized personnel based on principle of least privilege (AC.02). Access to the source code repository is restricted to only authorized personnel (AC.03).

Data Integrity

Control Objective 3: Controls provide reasonable assurance that data inputs are recorded accurately.

SmartCECL has built-in data validations where reasonable. Fields that are clearly defined as numeric, dates, etc. are validated for formatting. Interest rates are allowed in a whole integer or decimal format. The system will convert whole integers where possible to decimal. The system will not import data into fields that are designated as numeric values or dates unless the data to be imported matches the format. If data does not match expected values, an error message will result (DA.01). Where clients have privileges to manipulate data, balances are in place to not allow negatives results in the ACL or exceed 100% of expected values (i.e., unfunded draw cannot exceed 100% of segment total). The system will not allow the resulting ACL for any segment to be a negative number and will default to zero (DA.03) When setting weighting between peer and institution, the system requires the combination of the two weightings to equal 100%; otherwise, an error message will result (DA.02). If any validation is triggered, the client is notified in the application.

SmartCECL will set values for clients in rare conditions. When data is overwritten, the client will be notified in the application of such changes. User documentation identifies any fields that are calculated for the client if data is not presented in the import file.

SmartCall follows the field attributes as set by the FFIEC taxonomy and will not allow data entry that conflicts (DA.04). Following the taxonomy rules, the system sums fields where appropriate (DA.05). Prior to submission SmartCall reviews all entries for compliance with FFIEC taxonomy as published. Additionally, the system will review data for historic value variations in excess of 200% by default or where previously reported as zero (DA.06).

Management Oversight, Organization, and Administration

Control Objective 4: Controls provide reasonable assurance that functional responsibilities are separated, and policies and procedures exist for communications, risk assessment, and monitoring.

Fed Reporter is a flat organization with a few teams. The organization chart is updated as needed and reviewed annually. The organization is separated into functional areas and the reporting lines associated with each functional area are documented in an organizational chart (OM.02).

Management has formulated, developed, and documented policies and procedures governing the organization’s activities. Annually, employees must sign off on key policies/procedures. Policies are communicated via email and stored in a shared folder on Box.com (OM.01).

The Board meets at least once annually to discuss the direction and general status of the organization.

Reports Available for User Entities

Fed Reporter makes the following standard reports available to users through the applications' menus.

- SmartCall
  - BankMiner Reports – suite of reports that provide Capital Analysis, Trends, Peer Analysis and Performance.
  - Management Reports – Provides information on bank performance and metrics from the Call Report with four quarters of historical data. Also includes Definitions/Calculations for each report.
  - Prior Period Comparison – Compares current quarter to two previous quarters call report values by schedule.
  - Prior Year Comparison – Compares current quarter to last year's quarter call report values by schedule.
- SmartCECL
  - Standard Reports – presents printer ready reports of each screen within the application. Includes one additional overview report of the ACL results with comparison to the previous period.
  - Additional Reports – includes the paper reports in Excel friendly format, a report of captured Notes, Active Peer Group for custom peer groups, and Model Performance Report.
  - Audit Reports – Detailed reports that include all data utilized and the calculation for Loan Amortization, Average Remaining Life, Prepayments, Unfunded Commitments, and WARM Loss Rates.

Any changes to standard system reports follow the previously described change management controls.

Complementary User Entity Controls

The SmartCall and SmartCECL Applications control structure is designed with the assumption that certain controls would be implemented by user entities. This section describes user entity controls identified by Fed Reporter as necessary to achieve the specified control objectives.

The user entity controls described below should not be regarded as a comprehensive list of all controls which should be employed by user entities. Each user entity's internal control over financial reporting should be evaluated in conjunction with Fed Reporter's controls and the complementary user entity controls identified below.

User entities are responsible for the following:

Complementary User Entity Controls	Related Control Objectives
Clients are responsible for granting, modifying, and removing access to the system.	Control Objective 2: Logical Access
Clients are responsible for monitoring the appropriateness of their users on the system on at least an annual basis.	Control Objective 2: Logical Access
Clients are responsible for Installing the system within their environment and implementing any updates provided.	Control Objective 1: Application Change Management
Clients are responsible for backing up the system and data.	Control Objective 1: Application Change Management
Clients are responsible for importing or entering complete and accurate information into the system.	Control Objective 3: Data Integrity
Clients should be reviewing the SmartCECL audit trails and public FDIC data available for loss rates utilized and defining controls and procedures around this process.	Control Objective 3: Data Integrity
Clients are responsible for reviewing historic value variations in SmartCall and taking appropriate action if any of the data input was incorrect.	Control Objective 3: Data Integrity
Clients using SmartCall are responsible for filing their FFIEC 031, 041, or 051 Call Report with the FDIC and ensuring it is accepted.	Control Objective 3: Data Integrity

SECTION IV: Independent Service Auditor's Description of Tests of Controls and Results

Overview of Crowe LLP's Test Procedures

Our examination was restricted to the control activities specified by Fed Reporter, Inc.'s (Fed Reporter) management in Sections III and IV of this report to address the control objectives that were stated in the description. Our examination did not extend to any other control procedures, including those that may be described in Section III but not listed in Section IV.

The following table clarifies certain terms that may be used within this section to describe the nature of the tests of controls performed:

Type of Testing	Description
Observation	Observed the application, performance or existence of the specified controls as described.
Inspection	Inspected manually or systematically maintained documentation to evidence performance of the specified controls.
Reperformance	Reperformed the specified controls as performed by management to compare our independent results to those of management.

As Crowe conducted inquiry with appropriate Fed Reporter personnel for all controls, inquiry was not listed specifically by each control within Section IV.

In addition, when using information produced by Fed Reporter, we performed procedures as required by AT-C Section 320 to validate whether the information was sufficiently reliable for our purposes by obtaining evidence about the completeness and accuracy of such information, as well as evaluating whether the information produced was sufficiently precise and detailed for our purposes.

Control Objective 1: Application and Database Change Management

Control Objective 1: Controls provide reasonable assurance that the development of applications and maintenance of existing applications are documented, tested, and approved prior to being moved to production.

#	Fed Reporter's Control	Tests of Controls	Results
CM.01	All program changes, including emergency changes, are required to be authorized, tested, and approved prior to deploying into production. All changes are documented and tracked within the project management and tracking system.	Inspected tracking documentation for a sample of changes to determine if changes were authorized, tested and approved prior to deploying into production.	No exceptions noted.
CM.02	A version control tool is utilized to manage and protect code integrity.	Observed the version control tool configurations to determine if it was configured to protect code integrity. Inspected the version control repository to determine if the system had rollback capabilities.	No exceptions noted.
CM.03a	For SmartCECL, full regression and performance tests are done before any changes are pushed to production.	Inspected documentation for a sample of application changes to determine if changes were tested, including regression and performance testing, prior to deployment.	No exceptions noted.
CM.03b	For SmartCall, performance tests are done before any changes are pushed to production.	Inspected documentation for a sample of application changes to determine if changes were tested, including performance testing, prior to deployment.	No exceptions noted.
CM.04	Separate development, test and production environments are in place to segregate change management activities.	Inspected system settings to determine if the production environment was configured to be separate from the development and test environment.	No exceptions noted.
CM.05	An individual separate from developer reviews changes implemented and closes the ticket to document review of the changes implemented and ensure only changes authorized and tested were implemented.	Inspected documentation for a sample of application changes to determine if their associated tickets were reviewed by an individual separate from developer to ensure only changes authorized and tested were implemented.	No exceptions noted.

Control Objective 1: Controls provide reasonable assurance that the development of applications and maintenance of existing applications are documented, tested, and approved prior to being moved to production.			
#	**Fed Reporter's Control**	**Tests of Controls**	**Results**
CM.06	User Guides detailing changes are updated, reviewed, and distributed to end users. Other individuals review the User Guides than those who developed the change.	Inspected user guides for a sample of changes to determine if separate individuals reviewed these user guides other than the ones who developed the change and the user guides were distributed to end users,	No exceptions noted.
CM.07	For SmartCall, Quarterly Call Report updates are reviewed and validated for accuracy in new release. A ReadMe.pdf is supplied to client base for reference.	Inspected a sample of Quarterly Call Report updates to determine if separate individuals reviewed these user guides other than the ones who developed the change and if changes were supplied to client base for reference.	No exceptions noted.

Control Objective 2: Logical Access

Control Objective 2: Controls provide reasonable assurance that logical access to the network, production applications, operating systems and data is restricted to authorized individuals.			
#	**Fed Reporter's Control**	**Tests of Controls**	**Results**
AC.01	Password settings for authentication to DevOps are configured to comply with the Corporate Password Policy.	Inspected password parameters to determine if they were configured to meet minimum requirements per the Corporate Password Policy.	No exceptions noted.
AC.02	Administrative access to production servers and databases is restricted only to authorized personnel based on principle of least privilege.	Inspected a system generated listing of users with access to production servers and databases to determine if access was restricted to authorized personnel.	No exceptions noted.
AC.03	Access to the source code repository is restricted to only authorized personnel.	Inspected a system generated listing of users with access to program source code to determine if access was restricted to authorized personnel.	No exceptions noted.
AC.04	User access is reviewed annually to evaluate if users' access permissions align with their job duties.	Inspected the annual user access review documentation to determine if review was completed for all users and access flagged for removal was revoked, where applicable.	No exceptions noted.

Control Objective 3: Data Integrity

#	Fed Reporter's Control	Tests of Controls	Results
Control Objective 3: Controls provide reasonable assurance that data inputs are recorded accurately.			
DA.01	For SmartCECL, the system will not import data into fields that are designated as numeric value or dates unless the data to be imported matches that format. If data does not match expected values, an error message will result.	Observed a loan import file with improper data types to determine if an error message will result.	No exceptions noted.
DA.02	For SmartCECL, when setting weighting between peer and institution, the system requires the combination of the two weightings to equal 100%; otherwise, an error message will result.	Observed an attempt to enter an institution weighting value over 100% to determine if an error message will result that prevents a user from proceeding until it is corrected.	No exceptions noted.
DA.03	For SmartCECL, the system will not allow the resulting ACL for any segment to be a negative number and will default to zero.	Observed an attempt to enter a variable value that would result in a negative ACL to determine if an error message will result and would default to zero.	No exceptions noted.
DA.04	For SmartCall, the system will not allow entry of data that does not match field attributes as defined by Taxonomy provided by FFIEC.	Observed an attempt to enter improper data types to determine if an error message will result and prompt a user to re-enter data that complies with the Taxonomy provided by FFIEC.	No exceptions noted.
DA.05	For SmartCall, the system will sum fields where data instructions are identified unless it conflicts with FDIC taxonomy.	Observed multiple fields being entered to determine if the system was summing into the designated field in accordance with data instructions.	No exceptions noted.
DA.06	For SmartCall, the system will catch historic value anomalies and variations beyond tolerance at 200% (default setting).	Observed an attempt to enter data that varied from historical values to determine if the system identified a value increase/decrease of more than the threshold tolerance.	No exceptions noted.

Control Objective 4: Management Oversight, Organization, and Administration

Control Objective 4: Controls provide reasonable assurance that functional responsibilities are separated, and policies and procedures exist for communications, risk assessment, and monitoring.			
#	**Fed Reporter's Control**	**Tests of Controls**	**Results**
OM.01	Management has formulated, developed, and documented policies and procedures governing the organization's activities. Annually, these policy updates are communicated to employees via email and are made available in Box.com.	Inspected the policies and procedures that govern the organization's activities to determine if annual updates were communicated to employees and available in Box.com.	No exceptions noted.
OM.02	The organization is separated into functional areas and the reporting lines associated with each functional area are documented in an organizational chart.	Inspected documented organizational charts to determine if authority, responsibility, and lines of reporting were established and if they were made available via the intranet.	No exceptions noted.