

# CRI CECL VALIDATION FRAMEWORK

## POLICIES:

- Roles, responsibilities, and segregation of duties
- Significant decisions, elections, and assumptions

## PROCESSES:

- Historical loss information
- Segmentation
- Individually evaluated loans
- Contractual term
- Credit loss measurement
- Reasonable and supportable forecasts
- Reversion
- Qualitative factors
- Loan charge-offs and recoveries
- Accrued interest receivable
- Off-balance sheet credit exposure
- Personnel

## CONTROL SYSTEMS:

- Governance
- Credit risk review
- Model risk management
- Performance analysis
- Data controls

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