

Federal Reserve Bank of San Francisco  
101 Market Street, San Francisco, California 94105

July 20, 2011

To State Member Banks, Bank  
Holding Companies, Financial Holding  
Companies, and Foreign Bank Offices  
in the Twelfth Federal Reserve District

**SR 11-8 Supervisory Guidance on Implementation Issues Related to the Advanced Measurement Approaches for Operational Risk**

The Board of Governors of the Federal Reserve System and the other federal banking agencies<sup>1</sup> are issuing the attached *Interagency Guidance on the Advanced Measurement Approaches for Operational Risk* to address and provide clarity on implementation issues related to the advanced measurement approaches (AMA) in the agencies' advanced capital adequacy framework (advanced approaches rule).<sup>2</sup> Since the guidance only applies to banking organizations that are required to adopt the advanced approaches or have opted to do so, it generally will not be applicable to community banking organizations. The guidance discusses certain common implementation issues and challenges, as well as key considerations for addressing these challenges in order to implement a satisfactory AMA framework.

The guidance focuses on the combination and use of the four required AMA data elements:

- 1) Internal operational loss event data
- 2) External operational loss event data
- 3) Scenario analysis
- 4) Business environment and internal control factors

Given some of the unique challenges related to the use of scenario analysis in the AMA, this data element is discussed in greater detail. Governance and validation are also discussed in light of their importance in ensuring the integrity of a bank's AMA framework. While this guidance addresses certain aspects of the minimum risk-based capital requirements for operational risk, it is not intended to address the treatment of operational risk in a bank's internal capital adequacy assessment process.

Questions on the attached guidance should be addressed to Adrienne Haden, Assistant Director, Operational and Information Technology Risk, at (202) 452-2058, or Kenneth Fulton, Supervisory Financial Analyst, Risk Section, at (202) 452-2314. In addition, questions may be sent via the Board's public website.<sup>3</sup>

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<sup>1</sup> The other federal banking agencies include the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, and the Office of Thrift Supervision.

<sup>2</sup> See 12 CFR 208, Appendix F, and 12 CFR 225, Appendix G.

<sup>3</sup> See <http://www.federalreserve.gov/feedback.cfm>.

**Additional Information**

All circulars and documents are available on the Internet through the Federal Reserve Bank of San Francisco's website, at <http://www.frbsf.org/banking/letters>.

For additional information, please contact:

Federal Reserve Bank of San Francisco  
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(415) 974-2923

**Attachment:** [Interagency Guidance on the Advanced Measurement Approaches for Operational Risk \(93KB PDF\)](#)