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Operationalizing your bank

Core operations and controls

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Center for
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About the series

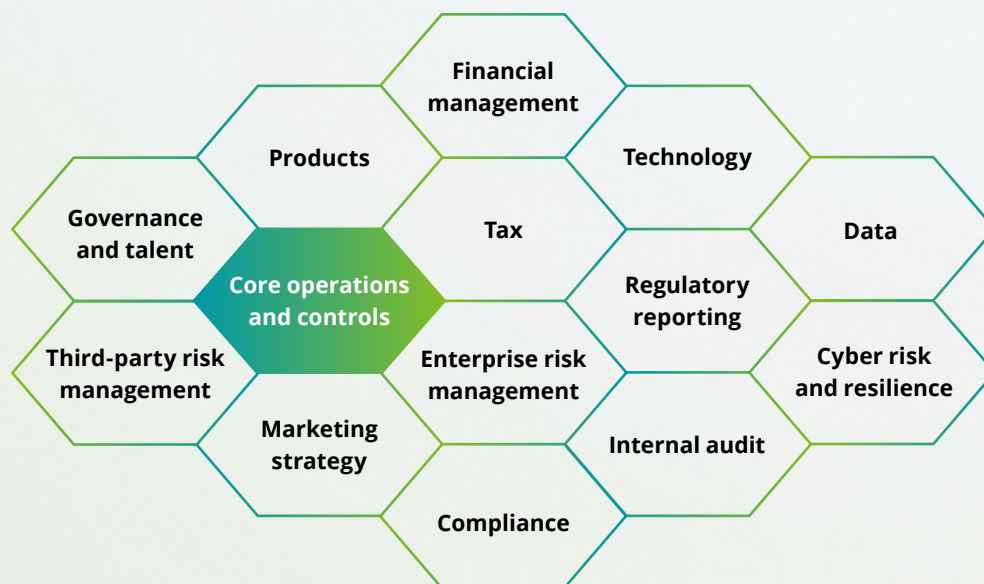
This perspective is part of Deloitte's *Operationalizing your bank* series, designed for applicants that have received conditional approval, are progressing toward final approval, or are focused on preparing for bank launch.

In this edition, we focus on core operations and controls and the challenge of translating product designs, regulatory commitments, and operating model decisions into repeatable processes that can be executed and overseen from Day 1.

Regulators expect new banks to demonstrate not only that documentation related to policies and controls has been established, but also that critical processes and related controls are executable, effective, and end-to-end; that accountability is clearly defined; and management has visibility into how work is performed across the bank, affiliates, and third parties.

Other editions of this series focus on the remaining foundational areas listed in Figure 1.

Figure 1: Series topics



The term “bank” is used broadly throughout this series to cover considerations across common bank charter structures, including national banks, state member/nonmember banks, national trust banks, and industrial loan companies (ILCs). Foreign banking organizations, US branches, and bank holding companies have a number of other nuanced and unique considerations. While this series aims to address broadly applicable operationalization considerations, organizations should evaluate this guidance within the context of their business strategy, targeted charter type, and general circumstances, as institution-specific requirements may warrant additional considerations beyond what is outlined in this series.

Operationalizing core operations and controls

A business plan sets the bank's strategic direction and defines what it intends to achieve, while the operations translate that plan into day-to-day execution, delivering products and services safely, consistently, and at scale. As organizations move from conditional approval toward launch, each product must be supported by operational capabilities, from onboarding and transaction processing through servicing, monitoring, issue resolution, and reporting. Getting this right requires banks to translate strategic objectives, regulatory commitments, and operating model (people, process, technology) decisions into repeatable processes supported by effective controls, clear accountability, and oversight. Together, these elements provide the operational foundation needed to execute products as intended from Day 1 and scale them as the bank grows.

Core insights

- 1 Process architecture is the foundation:** A business plan needs to have an appropriate organizing construct (spanning processes, technology, and operating model) that translates decisions into actions. These decisions should not be made in isolation based on each team's assumptions. If coordination is not present, the result can be misalignment that surfaces late and is expensive to fix. A structured process architecture organized by products or services that is mapped across the operating lifecycle gives leadership a shared view of what the bank does, where handoffs occur, and what must be operational on Day 1. This becomes the master reference that all subsequent build, buy, and configure decisions trace back to.
- 2 Process mapping illuminates the invisible:** New banks often begin with assumptions (such as reusing existing capabilities from an affiliate, vendor, or prior application) that don't hold up once processes are written step-by-step. Mapping each process against actual people, systems, and procedures can help expose these gaps with precision. This can help identify readiness concerns and highlight scoped, assignable gaps that the bank team can remediate prior to opening.
- 3 Operating model decisions follow process clarity:** An operating model defines who does what. However, without a grounded view of underlying processes, it remains theoretical. Once processes are mapped, a bank can make deliberate, defensible decisions about what sits in-house at the bank versus with an affiliate or third party, where human judgment is required versus where automation can run, and how work is handed off across teams and entities. Defining handoffs between the bank, affiliates, and vendors can help banks put in place a practical blueprint for execution by Day 1.
- 4 Processes reveal where controls and control gaps exist:** Cataloging regulatory requirements and control expectations before fully understanding how work will be executed may result in generic controls that are disconnected from the bank's daily operations. By first mapping processes, management can identify where risks arise, where decisions are made, and where preventive or detective controls should be embedded. It can also highlight a common source of control failures—handoffs between teams, affiliates, third parties, AI models and agents, and systems—where ownership, information flow, and oversight are often less clear.
- 5 The control inventory becomes a decision-making tool:** A control inventory detailing what controls exist, where they sit within bank processes, and who owns them is a prerequisite for understanding whether the control environment is ready for launch. New banks may approach this differently, with some drawing on controls from an affiliate or vendor, while others build from scratch. The inventory can help identify where controls may require enhancements or where new controls should be built. Meanwhile, process walkthroughs can reveal where undocumented controls are operating. In all cases, the completed inventory gives management a basis for deciding what controls to build, to enhance, to rely on (and in what order) before bank opening.

Actions for launch readiness

- 1 Build the process inventory early:** A well-curated process repository, organized by products and services, serves as the construct for understanding how the bank operates and a reference for design decisions. For each process, de novo banks should document the trigger, inputs, steps, outputs, and responsible party. The goal should be a complete and current picture that identifies interdependencies and sequencing constraints which may become costly surprises if discovered during implementation. Processes tied to launch should be prioritized, with subsequent efforts sequenced based on launch timelines.
- 2 Define accountability at the process level:** Processes should be used as the basis for designing the bank's operating model and determining roles and responsibilities. Ownership at the product or functional level alone can create ambiguity when activities span multiple teams, affiliates, and third parties. Defining accountability at the process level helps provide clarity on who is accountable and involved across process execution, issue resolution, and ongoing improvement. For cross-boundary processes, it's important to explicitly document handoffs, including what is transferred, in what form, and within what timeframe. Oversight mechanisms should be established to provide management with visibility into process execution and accountability across the lifecycle.
- 3 Use the process map to drive technology and vendor implementation decisions:** Once the process inventory is complete, de novo banks should evaluate each process step against its available systems, tools, and vendors. This can help prevent surprises during implementation, when there may be little to no time to correct course. As processes are disaggregated into individual activities, gaps in technology and vendor support often emerge, highlighting requirements that may not have been evident during initial selection. Where capability gaps exist for supporting process execution, the bank should decide how to close them by adding tools or establishing manual workarounds to support a process step.
- 4 Build a risk and control matrix grounded in process execution:** Risk and control matrices linking process activities to risks, regulatory obligations, controls, and accountable owners help provide clear traceability from regulatory requirements to operational execution. The exercise should validate that risks are addressed where they arise in the process, identify control gaps created by handoffs, and provide a clear line of sight from regulatory requirements through to operational execution. The resulting framework should demonstrate how the bank's control environment supports safe and sound operations from Day 1.
- 5 Validate controls through process walkthroughs:** Structured walkthroughs of critical Day 1 processes can be used to verify that control activities and ownership are appropriately designed. Successful walkthroughs trace a transaction, request, or event through the complete process and customer lifecycle, including all participating teams, affiliates, and third parties. Gaps uncovered during testing should be remediated prior to launch, with documented evidence that controls are functioning as designed and that management has visibility into process execution and exception handling.

Where to go from here

Operations and controls are foundational elements of a launch-ready bank that is capable of operating safely, consistently, and in compliance with regulatory expectations. Organizations should begin by assessing the completeness of their process architecture, accountability model, and control inventory. Building a process framework that clearly defines how work is executed—and a control environment that demonstrates oversight of activities performed by the bank, affiliates, and third parties—will be critical to satisfying pre-opening requirements. Longer term, evaluating processes can create the opportunity to deliberately customize the bank's technology stack and build agents that maximize automation. When done well, a bank's process architecture and control framework can become the foundation upon which the bank can scale products, operations, and oversight long after Day 1.



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