

**Supporting Statement for
OMB Control Number 1557-0199
Examination Questionnaire**

A. Justification

1. Circumstances that make the collection necessary:

This information collection provides the OCC with information needed to properly evaluate the effectiveness of the examination process, overall supervision, and agency communication. To assure bankers of OCC's interest in frank comments, the administration of this process is assigned to the Office of the Ombudsman. By providing complete independence and confidentiality, the assignment alleviates bankers' concerns over retaliation or retribution. The OCC Ombudsman promotes OCC/banker communications and resolves problems and conflicts.

Each bank is provided an Examination Questionnaire (Questionnaire) at the end of their supervisory cycle (12 or 18 month period). This information collection permits banks to assess the OCC's bank supervisory activities, including the:

- Effectiveness of OCC communications with the bank;
- Reasonableness of requests for data and information;
- Quality of OCC decision making during the exam process;
- Professionalism of OCC examining staff; and
- OCC examiner responsiveness.

The Questionnaire was developed by the OCC at the suggestion of the banking industry. Banking industry members expressed a need for an opportunity to provide examination-related feedback to the OCC. The Comptroller and OCC Supervisory Staff considered that expressed need and concurred. Further, the Comptroller and OCC Supervisory Staff finds this information collection to be an important tool for measuring OCC examination performance, in designing more efficient and effective examinations, and in targeting examiner training.

This information collection continues to formalize and promotes a long-standing OCC program. The OCC has always provided the opportunity for banks to provide input regarding the examination process. The Questionnaire evolved from a collection titled *Customer Service Information Collections*. That information collection received a very positive response from bankers.

2. Use of the information:

The OCC Ombudsman follows up on any significant issues raised, whether they pertain to examination procedures, practices, or personnel. The OCC created the Ombudsman position specifically to resolve problems of this type. The OCC Ombudsman regularly performs these tasks and is trusted by bankers and OCC staff.

The OCC Ombudsman and his staff receive and process the information, and will not release information on individual banks. The information is be used primarily by the Senior Deputy Comptroller for Mid-size/Community Bank Supervision, the Senior Deputy Comptroller for Large Bank Supervision, and the Chief National Bank Examiner.

3. Consideration of the use of improved information technology:

Bankers may submit this information collection directly to the OCC Ombudsman in hard copy, or may telephone or fax the Ombudsman regarding their feedback. Additionally, the information collection is available electronically on OCC's BankNet.

4. Efforts to identify duplication:

This information collection is unique to the bank and to the supervisory cycle. It is not duplicated anywhere.

5. Methods used to minimize burden if the collection has a significant impact on small businesses or other small entities:

Not applicable. This information collection will not have a significant impact on a substantial number of small entities.

6. Consequences to the Federal program if the collection were conducted less frequently:

This information collection is conducted only upon completion of a bank's supervisory cycle. Less frequent collection would result in the collection, processing, and follow-up of stale information, impairing the effectiveness of this program.

7. Special circumstances that would cause the collection to be conducted in a manner inconsistent with 5 CFR Part 1320:

Not applicable. This information collection is conducted in accordance with OMB guidelines in 5 CFR 1320.

8. Efforts to consult with persons outside the agency:

On July 26, 2007, the OCC published a notice in the Federal Register soliciting comments for 60 days on the proposed extension of this information collection (72 FR 41105). The OCC received no comments.

9. Payment to respondents:

None.

10. Any assurance of confidentiality provided to respondents:

The OCC Ombudsman receives and processes the information and takes needed follow-up action. The OCC Ombudsman does not release information on individual banks and treats this information as examination-related material.

11. Justification for questions of a sensitive nature:

Not applicable.

12. Burden estimate:

The OCC provides the Questionnaire to bank management and directors at the completion of the institution's supervisory cycle. Bank management may comment on overall supervision provided throughout the year, at the conclusion of examination activities, and annually. The OCC expects that, on average, banks will make approximately 1 response per year.

The Questionnaire is filled out by bank management, and requests the manager's opinions. Little, if any, research is needed to complete the Questionnaire and it is very user-friendly. The Questionnaire is designed in a simple and straight-forward manner and includes needed addresses, telephone, and fax numbers.

The OCC estimates that, on average, 1,800 banks will complete the Questionnaire. Due to differences in the supervisory cycle between large and small banks, the OCC estimates that it will receive .89 responses per respondent per year. The burden of completing the Questionnaire varies. A response may take a very short time if bank management has no descriptive comments, and could take 30 minutes or more on those occasions where bank management has substantial descriptive comments. The OCC estimates burden to average about 10 minutes.

The OCC estimates the burden as follows:

1,800 banks @ .89 response per year = 1,602 responses

1,602 responses @ 10 minutes per response = 267 burden hours

13. Estimate of annualized cost to respondents:

None.

14. Estimate of annualized cost to the Federal government:

None.

15. Changes in burden:

The OCC has made no material changes to the collection. However, the OCC has changed the number of respondents based on the current number of OCC-regulated banks.

Former burden: 2,100 banks @ .89 response per year = 1,869 responses
1,869 responses @ 10 minutes per response = 312 burden hours

New burden: 1,800 banks @ .89 responses per year = 1,602 responses
1,602 responses @ 10 minutes per response = 267 burden hours

Difference: - 300 respondents; - 267 responses; - 45 burden hours

16. Information regarding collections whose results are planned to be published for statistical use:

Not applicable.

17. Display of expiration date:

Not applicable.

18. Exceptions to the certification statement:

None.

B. Collections of Information Employing Statistical Methods:

Not applicable.