

**Supporting Statement for
OMB Control Number 1557-0199
Examination/Exit Survey**

A. Justification

1. Circumstances that make the collection necessary:

This information collection provides the OCC with information needed to evaluate the effectiveness of its examination processes, overall supervision, and communication. To assure bankers of the OCC's interest in obtaining frank comments, administration of this process is assigned to the Office of the Ombudsman, where it can be administered with complete independence and confidentiality in order to alleviate bankers' concerns over retaliation or retribution. The OCC Ombudsman promotes OCC/banker communications and resolves problems and conflicts.

The OCC provides each national bank or Federal savings association with an Examination Survey 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
- The responsiveness of OCC examiners.

The survey was developed by the OCC at the suggestion of the banking industry. Banking industry members expressed a desire 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 find 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.

The OCC also will provide each national bank and Federal savings association exiting the OCC's examination and supervision system with a Post-Exit Survey. This information collection will help OCC understand the underlying reasons why national banks and Federal savings associations decide to leave the system. OCC will use this information to improve relationships with Federally-chartered banks and savings associations and to identify problems that may impair the effectiveness of the examination and supervisory process.

This information collection continues to formalize and promote a long-standing OCC program. The OCC always has given the institutions it supervises the opportunity to provide input regarding the examination process. The survey 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, but will not release information on individual banks. The information is 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 will be able to complete the survey using a secure web-based data collection tool. The web-based tool is SAS-70 compliant and operates on a FISMA-compliant hosting infrastructure. The tool also enables the development of Section 508 compliant surveys.

4. Efforts to identify duplication:

This information collection is unique to the institution and 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 supervisory cycle or the exit of a supervised institution from the OCC's supervisory system. 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 March 27, 2013, the OCC published a notice in the *Federal Register* soliciting comments for 60 days on the proposed extension of this information collection (75 FR 42825). No comments were received.

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 institutions 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 Examination Survey 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, or annually. The OCC expects that, on average, national banks and Federal savings associations will submit approximately one response per year. The OCC provides the Post-Exit Survey to management and directors as their institutions leave the examination and supervision system. Management may comment on the reasons their institution decided to exit the system in a single response as they exit the system.

The survey is completed by bank or savings association management, and requests the manager's opinions. Little, if any, research is needed to complete the survey and it is very user-friendly. The survey is designed in a simple and straightforward manner.

The OCC estimates that, on average, **1,307 national** banks and Federal savings associations will complete the Examination Survey. Due to differences in the supervisory cycle between large and small institutions, the OCC estimates that it will receive .54 responses per respondent per year. The burden of completing the survey varies. A response may take a very short time if management has no descriptive comments, and could take 30 minutes or more on those occasions where management has substantial descriptive comments. The OCC estimates the burden to average about 10 minutes.

The OCC estimates the burden as follows:

1,307 banks @ .54 responses per year = 706 responses

706 responses @ 10 minutes per response = 118 burden hours

The OCC estimates that, on average, 50 national banks or Federal savings associations will complete the Post-Exit Survey. Due to the varying reasons institutions exit the OCC's examination and supervision system, the OCC estimates that it will receive .25 responses per respondent per year. The OCC estimates the burden to average about 5 minutes.

The OCC estimates the burden as follows:

50 banks @ .25 responses per year = 12 responses

12 responses @ 5 minutes per response = 1 burden hour

13. Estimate of annualized cost to respondents:

None.

14. Estimate of annualized cost to the Federal government:

None.

15. Changes in burden:

Examination Survey:

Former burden: 2,229 banks @ .89 response per year = 1,984 responses
1,984 responses @ 10 minutes per response = 331 burden hours

New burden: 1,307 banks @ .54 response per year = 706 responses
706 responses @ 10 minutes per response = 118 burden hours

Difference: - 922 respondents; - 1,278 responses; - 213 burden hours

The new burden respondent count for the Examination Survey reflects the current number of Federally-chartered banks and savings associations under OCC supervision (1,307). The former burden count (2,229) was a result of a nonmaterial change made during the integration of the Office of Thrift Supervision into the OCC in 2011, which was overstated. The former burden respondent count (2,229) has now been brought into line (1,307).

The decrease in number of responses per year for the Examination Survey reflects current examination schedules (-1,278).

Post-Exit Survey:

Former Burden: None. Addition to collection.

New burden: 50 banks @ .25 responses per year = 12 responses
12 responses @ 5 minutes per response = 1 burden hour

Difference: + 50 respondents; + 12 responses; +1 burden hour

The respondent count (50) for the Post-Exit Survey reflects the number of Federally-chartered banks and savings associations exiting the OCC examination and supervision system.

Overall Change in Burden:

The decrease in the respondent count and the decrease in the number of responses per year for the Examination Survey, combined with the addition of the Post-Exit Survey result in an overall burden decrease of 212 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.