# Office of the Comptroller of the Currency Washington, DC 20219

## **EXAMINATION AND SUPERVISORY SURVEY**

The Office of the Comptroller of the Currency (OCC), Office of the Ombudsman is conducting a survey to evaluate the content and conduct of OCC examinations and supervision. Your institution's input will help measure OCC's performance and progress in improving the supervisory experience and agency communications. Your institution's participation in this survey is essential for OCC to improve every institution's experience with future supervision and examination processes.

Participation in this survey is completely voluntary. Individual responses will be kept confidential. The survey is estimated to take approximately 10 minutes of your time, but will vary depending on the extent of comments you provide.

For questions about the nature of the survey or to report concerns of a substantive nature about the survey, please contact Mr. Larry Hattix, Ombudsman, OCC, at <a href="mailto:larry.hattix@occ.treas.gov">larry.hattix@occ.treas.gov</a> or by phone at (202) 649-5530.

For technical questions about the operability of the online survey, please contact Ms. Brittany Shanks, LMI, at <u>bshanks@lmi.org</u> or by phone at (703) 917-7095.

Thank you in advance for your participation!

#### PAPERWORK REDUCTION ACT STATEMENT FOR EXAMINATION QUESTIONNAIRE

No person is required to respond to an information collection unless it displays a currently valid OMB control number. This information collection is approved under Office of Management and Budget (OMB) Control Number 1557-0199. This information collection is voluntary. This information collection is needed to permit an institution to provide feedback, directly to the Office of the Ombudsman, Office of the Comptroller of the Currency (OCC Ombudsman), on the content and conduct of OCC examinations. OCC's Ombudsman will use the information received to evaluate the effectiveness of the examination process and agency communications. OCC's Ombudsman promotes OCC/banker communications and resolves problems and conflicts.

OCC expects to collect this information from approximately 1,307 institutions. Each respondent is estimated to file 0.54 responses per year. The burden per response is expected to average approximately 10 minutes. The time for completing the questionnaire will vary. A response may take a very short time if management has no descriptive comments, and could take 30 minutes or more in those instances where management has substantial descriptive comments. The burden for this collection is estimated at 118 burden hours per year.

### Work (OCC's Examination and Supervisory Process)

Please indicate the extent you agree or disagree with the following statements.

	Completely Agree	Agree	Somewhat Agree/ Somewhat Disagree	Disagree	Completely Disagree
1. The examination scope was appropriate for accurately assessing your institution's condition.	1+-		3	4	5 +
2. The supervisory objectives provided a necessary focus on business and compliance risks and an assessment of their signification.	ance. +-	2 +	3	4	5 +
3. The supervisory objectives provided a necessary focus on banking activities and compliance requirements that pose the highest risk to your institution.	1 +-	2 +	3	4+	5 +
4. The supervisory strategy resulted in appropriate development of the examination, key risks, and focus areas.	1 +-	2	3	4	5 +
5. The examination placed appropriate reliance on the internal audit function and internal risk management functions in the institution to support effective supervision.		2	3	4	5 +
6. The examination team's requests for information before and during the activities were justified by the examination scope.	1 +-	2	3	4	5 +
7. The examination team reviewed the information provided by you institution before engaging in discussions with bank personnel.	r 1 +-	2	3	4+	5 +
8. The examination team minimized the burden to the degree possible on the institution, its officers and employees when conducting the examination.  This includes coordination and cross-reliance with other regulators.	1+-	2	3	4	5 +
9. The <b>content</b> of the correspondence between OCC and your institution was consistent with the exit meetings, board meetings and other oral communications related to the exam conclusions. <i>Correspondence refers to reports, letters, conclusion memos, etc.</i>	1 +-	2	3	4+	5 +
10. The <b>tone</b> of the correspondence between OCC and your institution was consistent with the exit meetings, board meetings and other oral communications related to the exam conclusions. <i>Correspondence refers to reports, letters, conclusion memos, etc.</i>	1 +-	2 +	3	4+	5 +
11. If the conclusions changed during the OCC's review process, were the changes orally communicated?	1.	Yes	2. No 3. Not	Applicab	ole

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	Completely Agree	Agree	Somewhat Agree/ Somewhat Disagree	Disagree	1-31-2014 Completely Disagree	
12. The correspondence between OCC and your institution clearly communicated:		2 +-	3	4 +	5 +	
a) Supervisory findings	+	+-	+	+	+	
b) Significant issues	+		+			
c) Corrective actions with timeframes.  Correspondence refers to reports, letters, conclusion memos, etc.	+	+-	+	+	+	
13. OCC follows-up with your institution to ensure management addresses identified problems requiring corrective action.			3		_	
People (OCC Staff and Examination Teams)						
14. The examiner-in-charge was knowledgeable about the supervisory process.	1 +	2 +-	3	4 +	5 +	
15. Ongoing communication during the examination or throughout	1	2	3	4	5	
the year by the examiner-in-charge with senior management and the board or board committee(s) was appropriate.		+-	+	+	+	
16. The examination team was knowledgeable about the supervisory process.	1 +	2 +-	3 +	4 +	5 +	
17. The examination team conducted their activities in a professional manner.	1 +	2 +-	3 +	4 +	5 +	
18. The examination team was open to the exchange of ideas and findings with bank staff.	1 +	2	3	4 +	5 +	
19. The examination team provided useful feedback, observations, and suggestions.	1 +		3	4	5 +	
20. The examination team presented well-supported relevant conclusions regarding the institution's condition.	1	2	3	4 +	5 +	
21. During the past year, have you dealt with any of the following (	OCC staff?					
a) Corporate staff (e.g., for corporate applications);			show Q22a)	2. No (h	ide Q22a)	
b) Attorneys (e.g., for legal opinions);		` - /			2. No (hide Q22a)	
c) Accountants (e.g., for accounting opinions);	1	. Yes (s	2. No (h	ide Q22a)		
<ul><li>d) Policy staff in OCC Headquarters (e.g., for clarification of policy/guidance);</li><li>e) Economists (e.g., for modeling questions);</li></ul>		1. Yes (show Q22a) 2. No (l				
			show Q22a)	<ol> <li>No (hide Q22a)</li> <li>No (hide Q22a)</li> </ol>		
f) Lead experts (e.g., Subject Matter Experts for Credit,		Ì	- ,	,	- ,	
Compliance, Capital markets)		,	- /	2. No (hide Q22a)		
g) Other		. 168 (8	show Q22a)	2. No (hide Q22a)		

	Completely Agree	Agree	Somewhat Agree/ Somewhat Disagree	Disagree	Completely Disagree
22a. During the past year, OCC corporate staff (e.g., for corporate applications) have been responsive to your institution's requests for information or assistance.	1+	2	3	4+	5 +
22b. During the past year, <b>OCC attorneys (e.g., for legal opinions)</b> have been responsive to your institution's requests for information or assistance.	1+	2 +	3	4+	5 +
22c. During the past year, <b>OCC</b> accountants (e.g., for accounting <b>opinions</b> ) have been responsive to your institution's requests for information or assistance.	1+	2	3	4+	5+
22d. During the past year, <b>OCC policy staff in Headquarters (e.g., for clarification of policy/guidance)</b> have been responsive to your institution's requests for information or assistance.	1 +	2	3	4	5 +
22e. During the past year, <b>OCC Economists (e.g., for modeling questions)</b> have been responsive to your institution's requests for information or assistance.	1 +	2	3	4	5 +
22f. During the past year, <b>OCC lead experts (e.g., Subject Matter Experts for Credit, Compliance, Capital markets)</b> have been responsive to your institution's requests for information or assist			3		5 +
22g. During the past year, OCC (Other response will show) have been responsive to your institution's requests for information or assistance.	1 +	2	3	4+	5 +
23. <b>(Ask All)</b> During the past year, OCC field staff has been responsito your institution's requests for information or assistance.	ve 1 +	2	3	4	5 +
Products (Reports, Policies, and Regulations)					
24a.Was the examination report delivered within 90 days of the examination start date for a 1 or 2 composite rated bank or within 120 days of the examination start date for all other bank		Yes	2. No (show Q24	b)	
24b.Was your institution notified of the delay?	1.	Yes	2. No		
	Completely Agree	Agree	Somewhat Agree/ Somewhat Disagree	Disagree	Completely Disagree
25. The commitments for required corrective actions were determined in a fair and reasonable manner.	1	2 +	3	4	5 +
26. OCC identifies matters requiring attention before they can cause significant harm to your institution.	1	2	3	4	5 +
27. OCC's policy, guidance, and regulations target activities that present the greatest risk to:	1	2	3	4	5
<ul> <li>a) Safety and soundness</li> <li>b) The payments system</li> <li>c) The long-term viability of National Banks and Federal Savings Associations</li> </ul>	+		+ +		

Associations

28. OCC's policy, guidance, and regulations promote competitiveness and permit industry innovation.	1	2 +	3 +	4 +	5 +
29. OCC's policy, guidance, and regulations eliminate unnecessary regulatory requirements and minimize the burden of requirements necessary for effective supervision.	1	2+	3	4	5 +
30. OCC allows the offering of new products and services if your institution has the expertise and infrastructure to manage all of the associated risks effectively.	1 +	2	3	4+	5 +
31. OCC enforces CRA and fair lending laws by focusing on your institution's performance.	1	2	3	4	5 +
32. OCC assesses your institution's BSA/AML programs to ensure compliance with BSA/AML statutes and regulations.	1	2	3	4	5 +
33. OCC provides adequate technical advice in support of your institution's community development activities.	1	2	3	4 +	5 +

#### **Additional Comments**

34. How useful do you find the following aspects of OCC's supervision, including the examination that was just completed?

	Very Useful	Somewhat Useful	Not Very Useful	Not at all Useful	Not Applicable
Communication between your bank and OCC	0	0	0	0	0
Feedback and answers received from the	0	0	0	0	0
examination team					
Independent validation of operations	0	0	0	0	0
Knowledge/skills of the examination team	0	0	0	0	0
Length of the examination	0	0	0	0	0
Policy guidance on supervisory expectations	0	0	0	0	0
and emerging risks					
Professionalism of the examination team	0	0	0	0	0
Risk-based approach	0	0	0	0	0
Regulatory issues	0	0	0	0	0
Small/large bank approach	0	0	0	0	0
Other (please explain below)	0	0	0	0	0

you find useful or not useful.	i, that

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35. Please indicate any areas where you think OCC examiners need greater knowledge to understand your institution's lines of business and their inherent risks.
36. Please address any areas where you think OCC's fundamental supervision approach and/or methods of supervision need to change or evolve to keep pace with the industry.
Intent to Remain Under OCC Supervision
37. Has your institution considered switching charters during the past 12 months?
<ul> <li>Yes, my institution currently plans to switch charters</li> <li>Yes, my institution has considered switching charters but decided to remain in the system</li> <li>No, my institution does not currently plan to switch charters</li> </ul> (Go to Q-38) (Skip to End) (Skip to End)
38. When does your institution plan to switch charters?  ○ Immediately  ○ Within the next 6 months  ○ Between 6 months and 1 year from now  ○ Over a year from now
39. What are the main reasons your institution plans to switch charters?
Please choose all that apply.
□ Cost □ Access to agency decision makers □ Delays in getting decisions or answers □ Rules and regulations □ Supervisory policy and guidance □ Examination process □ Dissatisfaction with OCC □ Other (please explain below)
Please use the space below to explain any other reasons your institution plans to switch charters.

**Thank you for your feedback.** OCC values your opinions and will use your input to guide improvements in their supervisory and examination experience.