

**Examination Questionnaire  
Justification for Non-Material Change  
OMB Control No. 1557-0199**

This non-material change relates to the final three questions on the Examination Questionnaire regarding the respondent's intent to remain under OCC supervision.

The first question asks whether the respondent has considered switching charters during the past year (Question #37). If the response is that switching charters is planned, the respondent is directed to answer questions regarding when it plans to switch charters (Question #38) and the main reasons for the switch (Question #39). If the respondent indicates in Question #37 that it has considered switching but decided against it or it has no plans to switch, it is directed to skip the questions regarding when it plans to switch (Question #38) and its reasons for considering switching charters (Question #39).

The revision would be to have respondents who considered switching charters but didn't answer the question about their reasoning for their decision (Question #39). Question #39 is revised slightly to conform to the additional respondents.

We have not changed our burden estimates for this collection because they were estimated quite conservatively and are adequate to cover the additional respondents answering the additional question.

The following is a redline of the portion of the questionnaire that we plan to change:

**Intent to Remain Under OCC Supervision**

37. Has your institution considered switching charters during the past 12 months?

- Yes, my institution currently plans to switch charters  
**(Go to Q-38)**
- Yes, my institution has considered switching charters but decided to remain in the system  
**(Skip to End Go to Q-39)**
- No, my institution does not currently plan to switch charters  
**(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 considered for switching 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 considered for switching charters.

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