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The OCC's Strategic Plan (Fiscal Years 2012-2016)

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Comptroller of the Currency
Administrator of National Banks

US Department of the Treasury

The OCC's Strategic Plan



Fiscal Years 2012–2016

September 2011

Office of the Comptroller of the Currency
Washington, DC 20219

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Comments or questions can be sent to the Office of the Comptroller of the Currency,
Washington, DC 20219 or by e-mail to publicaffairs3@occ.treas.gov.

Message From Acting Comptroller John Walsh

I am proud to present the *Office of the Comptroller of the Currency's (OCC) Strategic Plan, Fiscal Years 2012–2016*.

The strategic plan describes the OCC's strategic goals and objectives for carrying out its mission during the next five years. The plan provides a road map for how the OCC will ensure a safe and sound system of national banks and federal savings associations (collectively, banks); promote equal access to financial services and fair treatment of bank customers; maintain a flexible legal and regulatory framework that enables a strong, competitive system of banks; and field a competent, highly motivated, and diverse workforce. Equally important, the plan explains the internal and external programs that will be implemented to ensure that the OCC achieves results in a cost-effective manner.

The OCC is engaged in 96 initiatives related to the implementation of the Dodd–Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd–Frank Act), which requires focus and diligence in the next several years. The OCC completed the orderly transfer of Office of Thrift Supervision staff and responsibilities in 2011, and the agency continues to serve on the Financial Stability Oversight Council. The OCC continues to work to reform capital and liquidity standards for financial institutions and collaborate with other regulators to identify and address irregularities in institutions' foreclosure processes.

The financial crisis of 2007–2009 serves as a stark reminder of how important the OCC's mission is to the American people and to maintaining confidence in the U.S. banking sector. Looking ahead, the OCC will remain vigilant in the face of risks to the financial institutions it supervises as they navigate a business landscape significantly changed by post-crisis market developments and by new rules implementing the Dodd–Frank Act.



John Walsh

September 26, 2011

The OCC Today

The OCC is charged with assuring the safety and soundness of, and compliance with laws and regulations, fair access to financial services, and fair treatment of customers by, the institutions and other persons subject to its jurisdiction. Any national banking association, federal branch or agency of a foreign bank, or federal savings association is subject to OCC's jurisdiction.

Currently, the OCC supervises 2,108 banking institutions (1,415 national banks, 642 federal savings associations, and 51 federal branches of foreign banks in the United States) with total assets of \$9.7 trillion. National bank and federal branch assets total \$8.8 trillion and federal savings association assets total \$907 billion.

The OCC has about 3,800 employees in locations throughout the United States. The OCC has its headquarters in Washington, D.C., a data center in Maryland, and four district offices in Chicago, Dallas, Denver, and New York. The Customer Assistance Group is located in Houston. The OCC also operates field and satellite offices in cities throughout the United States, resident examiner teams in the largest banking companies, and an examining office in London, England.

The OCC's operations are primarily funded by semiannual assessments levied on banks.

Condition of the Banking Industry

Since 2007, the banking industry has operated in a challenging environment that included the longest and deepest recession since the Great Depression and major disruptions to financial markets. During the recession, system-wide credit problems produced a sharp drop in net income for banks, and many institutions became unprofitable. Commercial and residential real estate values plummeted. Unemployment jumped sharply, leaving millions of Americans looking for work.

Banks are slowly recovering from the financial crisis. Aggregate industry net income is again positive, though below pre-recession levels, and 83 percent of OCC-supervised institutions were profitable as of June 2011. Credit problems have slowly abated, and charge-offs and noncurrent rates have fallen for most major loan categories. Still, those rates remain well above their long-run averages. The large drop in real estate property prices and continued sluggish growth in the labor markets suggest that banks will continue to face credit problems. Given this, the operating environment for the banking industry is likely to remain challenging for some time.

Bank revenues fell during the recession, as loan growth turned negative. In the past year, large banks have seen revenues rebound; smaller banks have not improved as much, in part because of continued credit losses in some types of commercial real estate lending and a slow recovery in the demand for loans by small businesses. Revenues are likely to remain under pressure until conditions improve significantly. Regulatory changes are also expected to reduce revenue growth over the next several years for banks in all asset size categories.

Below-par economic growth, deleveraging by households, and continued weakness in property markets has resulted in negative loan growth at banks for nearly all major loan categories. Many larger firms have sizeable cash reserves that may tend to restrain commercial demand for bank loans, and even medium-size firms can now tap the bond markets for long-term, low-rate loans. Deleveraging by households and the public sector is likely to continue, which will directly and indirectly dampen loan growth for the foreseeable future.

In the face of continuing credit problems, and without clear sources of revenue growth, profits at banks may remain anemic for some time. A less profitable banking system likely will be less resilient if confronted by stressful conditions in the future.

The OCC's Mission and Vision

Mission

To assure the safety and soundness of, and compliance with laws and regulations, fair access to financial services, and fair treatment of customers by national banks and federal savings associations.

Vision

The OCC seeks to assure a financial system in which national banks and federal savings associations soundly manage their risks, maintain the ability to compete effectively with other providers of financial services to meet the needs of their customers and communities for credit and financial services, comply with laws and regulations, and provide fair access to financial services and fair treatment of their customers.

Strategic Goals and Their Objectives and Strategies for Achieving the Goals

The OCC has four strategic goals:

- I. A safe and sound system of national banks and federal savings associations
- II. Fair access to financial services and fair treatment of national bank and federal savings association customers
- III. A flexible legal and regulatory framework that enables national banks and federal savings associations to provide a full, competitive array of financial services consistent with statutory and prudential safety and soundness constraints
- IV. A competent, highly motivated, and diverse workforce that makes effective use of OCC resources

Objectives and strategies are established for each strategic goal. Objectives further define the intended outcomes of each goal. Strategies are the means to align the OCC's operational processes, skills, technologies, and resources to achieve its strategic goals and objectives.

Strategic Goal I: A safe and sound system of national banks and federal savings associations

Strategic Objective 1: The OCC anticipates, understands, addresses, and conveys risks to banks. The OCC seeks to fulfill this objective by

- A. ensuring risk-based supervision is properly executed and focused on systemic and bank-specific risks.
- B. identifying new products, services, and emerging risk areas, including those related to operational and technology-related vulnerabilities, and adjusting its supervisory strategies and activities, as appropriate.
- C. complying with the examination schedule requirements of the Federal Deposit Insurance Corporation Improvement Act (FDICIA).
- D. resolving problem banks in a timely fashion, effectively, and when possible, without loss to the deposit insurance fund.
- E. taking prompt and effective enforcement actions when warranted.
- F. conducting examinations to determine compliance with the Bank Secrecy Act, anti-money laundering, and the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act (USA Patriot Act) requirements and enforcing anti-money laundering and anti-terrorism statutory and regulatory requirements.

- G. ensuring banks comply with requirements of the Treasury Asset Relief Program (TARP), Temporary Liquidity Guarantee Program (TLGP), and Small Business Lending Fund (SBLF) Program.
- H. incorporating applicable lessons learned from the financial crisis, natural disasters, or emergencies and continuing to conduct periodic system-wide reviews and testing.
- I. providing an independent appellate process for banks.
- J. administering educational programs for banks and their leaders.

Strategic Objective 2: The OCC cooperates with other U.S. and international financial supervisory authorities on common interests. The OCC seeks to fulfill this objective by

- A. working effectively with U.S. regulators and interagency groups to identify and address risks and emerging issues. The Comptroller serves on the board of directors of the Federal Deposit Insurance Corporation (FDIC) and the Federal Financial Institutions Examination Council (FFIEC), and is a member of the Financial Stability Oversight Council (FSOC). The OCC also works with the Basel Committee on Banking Supervision (Basel Committee), Financial Stability Board (FSB), the Joint Forum (JF), Senior Supervisors Group (SSG), Financial Banking and Infrastructure Information Committee (FBIIC), Bank Secrecy Act Advisory Group, and the National Interagency Bank Fraud Working Group.
- B. participating in joint supervisory programs, including the Shared National Credits (SNC) Program, Interagency Country Exposure Review Committee (ICERC), and the interagency examination program for multi-regional data processing servicers (MDPS).
- C. ensuring that Basel II and Basel III capital rule implementation embodies standards appropriate for the U.S. banking system.
- D. implementing existing and developing new coordination and collaboration agreements with the various federal regulators regarding supervisory activities performed in banks and with foreign regulators regarding supervisory activities and information exchange.

Strategic Objective 3: Supervisory methods, analytical tools, and data analytics keep pace with industry changes and appropriately support the broader mission of the OCC. The OCC seeks to fulfill this objective by

- A. deploying supervisory technology solutions to achieve better data quality and provide user-friendly examiner access to key bank and industry information.
- B. developing analytical tools and reports that make effective use of data collected from institutions to foster superior decision making for supervisory operations and policy.

- C. leveraging market-based and supervisory data and analyses to enhance supervision strategies and to provide an alternative, forward-looking perspective on emerging risks or pressure points systemically, across the industry, and for individual banking organizations.

Strategic Goal II: Fair access to financial services and fair treatment of national bank and federal savings association customers

Strategic Objective 1: All customers have fair access to financial services and are treated fairly. The OCC seeks to fulfill this objective by

- A. leading efforts to reform, and ensuring banks comply with, new mortgage servicing and foreclosure process standards.
- B. enhancing the OCC's fair lending examinations for those banks where the OCC retains supervisory responsibility for fair lending activities.
- C. continuing to address unsound and predatory lending practices, customer privacy, information security, and identity theft.
- D. reinforcing the importance of fair and honest treatment of bank customers through appropriate supervisory and enforcement actions, customer complaints handled by the OCC's Customer Assistance Group, and enhanced complaint-sharing between the OCC, the Consumer Financial Protection Bureau, and state agencies.

Strategic Objective 2: Banks are involved in community and economic development activities. The OCC seeks to fulfill this objective by

- A. supporting the efforts of banks to engage in sound and successful community development activities.
- B. providing industry consultations on the effective implementation of the Community Reinvestment Act.
- C. participating as a member of the Financial Literacy and Education Commission and the board of NeighborWorks America.
- D. participating constructively in interagency community and economic development activities.

Strategic Goal III: A flexible legal and regulatory framework that enables national banks and federal savings associations to provide a full, competitive array of financial services consistent with statutory and prudential safety and soundness constraints

Strategic Objective 1: Each OCC regulation is current, clearly written, and necessary for an effective supervisory process. The OCC seeks to fulfill this objective by

- A. implementing rulemakings required by the Dodd–Frank Act through successful collaboration and consultation with other federal agencies.
- B. reviewing and revising OCC regulations to further streamline and reflect new developments, including integration of OCC and former OTS regulations to embody common approaches.
- C. providing regulatory support for Basel II and Basel III capital rulemakings.

Strategic Objective 2: The OCC supports national bank and federal savings association efforts to remain competitive, consistent with safety and soundness. The OCC seeks to fulfill this objective by

- A. supporting the continued recognition of the preemptive attributes of the national bank and federal savings association charters through appropriate opinions, regulations, and participation in litigation, when warranted.
- B. developing and modernizing attributes of national bank and federal savings association charters and the role and status of the national bank and federal savings association industries.
- C. enhancing communications with other federal agencies and state authorities to facilitate better coordination on issues affecting national banks and federal savings associations.
- D. ensuring that regulations applicable to national banks and federal savings associations facilitate their involvement in community and economic development activities.
- E. communicating attributes of the national bank and federal savings association charters and developments concerning national bank and federal savings association activities within and outside of the OCC.

Strategic Objective 3: Licensing procedures are efficient and consistent with safety and soundness. The OCC seeks to fulfill this objective by

- A. reviewing licensing policies and procedures to provide clear and comprehensive guidance.
- B. implementing and maintaining processes for early screening of licensing applications and authorization requests.

- C. deploying new or enhancing existing technology solutions that support effective licensing operations.
- D. integrating OCC and former OTS licensing standards and processes into a common approach.

Strategic Goal IV: A competent, highly motivated, and diverse workforce that makes effective use of OCC resources

Strategic Objective 1: The OCC maintains a competent, highly motivated, and diverse workforce in a fair and inclusive work environment. The OCC seeks to fulfill this objective by

- A. maintaining a comprehensive Human Capital Strategic Plan that includes the agency's diversity goals and objectives.
- B. continuing to execute external hiring strategies to augment specialized skills to enhance the OCC's supervision of complex bank activities and organizations.
- C. continuing to execute the OCC's aggressive recruiting and comprehensive training strategy for new entry-level examiners.
- D. executing proactive initiatives focused on the retention of employees, including mentoring, employee feedback, employee outreach, incentives, and recognition programs.
- E. implementing and leveraging a metric-based training framework to develop a competent workforce, including the optimization of technology.
- F. creating a comprehensive leadership development program to support and enhance management succession.
- G. continuing various specialty skills programs to identify and develop examiners in the areas of asset management, bank information technology, capital markets, compliance, commercial lending, mortgage banking, retail lending, and operational risk.

Strategic Objective 2: The OCC is an efficient, effective, and ethical organization. The OCC seeks to fulfill this objective by

- A. ensuring compliance with laws, regulations, and stewardship of its resources through program evaluations, quality assurance reviews, and an enterprise-wide quality management framework.
- B. ensuring compliance with the rules, policies, and procedures for ethical conduct by its managers and employees.
- C. assuring reliable, secure, modern information technology systems and an environment that meet the OCC's mission, goals, and objectives.

- D. improving the effectiveness and integration of the current information technology governance structures, policies, processes, and procedures.
- E. deploying enterprise services to leverage technology and standard capabilities across the agency, with particular focus on information management initiatives, such as document, content, records, and knowledge management.
- F. ensuring existing technology that adds business value is properly maintained while re-engineering or implementing new systems, when appropriate.
- G. achieving increased efficiency and improved effectiveness by converting the information technology infrastructure from the mainframe platform to file servers.

Strategic Objective 3: The OCC's resource decisions and operations reflect sound financial, security, and risk management principles. The OCC seeks to fulfill this objective by

- A. implementing security controls commensurate with risk, to protect sensitive, private, and classified information.
- B. improving contingency planning for business continuity, including information technology recovery strategies, compliance with Homeland Security requirements, and crisis management strategies.
- C. improving the enterprise identity management program and ensuring compliance with Homeland Security requirements, Presidential directives, and e-Government initiatives.
- D. achieving reliable, accurate, and timely human and financial resources management information through enhanced internal controls.
- E. using best-practice benchmarks and risk assessments to guide resource allocation, management, and monitoring.

Key Factors Affecting the Achievement of Strategic Goals

There are several factors that affect the achievement of the OCC's strategic goals and program objectives. These factors fall into four broad categories: economic, human capital, legislative, and technology.

Economic

Shifts in financial markets and the economy affect the risk profile of the banking industry, with implications for the direction of OCC supervisory strategy. The severe recession that began in late 2007 left in its wake sharp reductions in bank income, continuing credit problems, and declining loan demand. These problems may not be resolved quickly, and this calls for watchfulness and flexibility by regulators.

Banks face an economic environment that will be difficult for some time. The slow pace of expected economic growth depresses both credit quality and revenue growth. Deleveraging by households, plus the corporate sector's ability to fund operations from retained earnings, have added to downward pressure on loan demand, at the same time that new laws and regulations may reduce income from fees and other noninterest sources. The extended period of low interest rates continues to squeeze household incomes, affecting demand for mortgage and consumer loans, and margins at many banks.

Financial markets stabilized after the financial crisis that began in 2008 but remain vulnerable to further shocks. Sovereign debt problems in Europe also continue to threaten a new wave of losses, which could jolt the markets again, as well as affecting large national banks with exposure to Europe.

Human Capital

There is no one factor more critical to the OCC's overall success or its ability to accomplish its mission than its people. Acquiring, developing, and retaining a competent, highly motivated, and diverse workforce continues to be one of the OCC's top priorities and is one of its four strategic goals. At the same time, and similar to the rest of the federal government, significant internal and external factors affect the OCC's current and future workforce, challenging the agency's ability to ensure that the right people are in the right positions at the right time. Human capital will remain a critically important issue for the OCC over the next five years.

The OCC is facing retirements at unprecedented numbers and with it the loss of institutional knowledge and key leadership at all levels. The OCC expects the number of retirement eligibles, as well as the actual number of retirements, to increase over the next 10 years. By the end of fiscal year 2015, 32 percent of OCC's current workforce will have either retired or attained eligibility for retirement. In certain areas, the impact will be greater. For example, 59 percent of our current Assistant Deputy Comptrollers will have retired or become eligible for retirement by the end of fiscal year 2015. At the same time, the OCC faces a competitive market for talent and a talent pool that is multigenerational and more diverse than ever before. This presents both

challenges and opportunities. Continued focus on building the agency's pipeline of talent, particularly through its entry-level examiner hiring program, remains a priority.

To remain a competitive, highly attractive employer, the OCC must continue to make diversity a priority. Support for diversity and ensuring an inclusive and respectful work environment is an important component of any successful organization. Given the changing demographics of the twenty-first-century workforce, diversity principles must be integrated into the OCC's daily operations and decision making. The OCC has been long recognized as one of the best places to work in federal government, ranking in the top 10 among similarly sized federal agencies, especially in its support for diversity, training and development, and family-friendly policies and programs. A number of variables affect employee engagement and satisfaction—and thereby affect recruitment and retention—including flexible work environments, support for work-life balance and alignment of individual performance to the agency's mission and strategic goals. Maintaining the OCC's standing among smaller federal agencies as a top employer and its reputation within the industry as a premier financial regulator will be critical to attracting and retaining the necessary talent over the next five years.

Succession planning, especially for key leadership and critical technical and expert positions, will be more important than ever. Capturing and making available the wealth of experience and expertise of the OCC's current workforce through knowledge management and knowledge transfer is a business imperative. Ensuring that the OCC's workforce, especially its mission-critical occupations of bank examiners, attorneys, and economists, is well trained, skilled, and capable of meeting the needs of the rapidly changing and extremely complex industry is essential. This is especially important given the recent expansion of OCC's mission to include the federal savings association industry. This will require identifying critical skills and competencies; assessing gaps; and designing, developing, and delivering training and development programs to build or to improve those critical skills and competencies.

Legislative

The Dodd-Frank Act resulted in sweeping changes in laws governing the financial services industry. The legislation requires a myriad of rulemaking projects and supervisory initiatives by the OCC and other federal financial regulatory agencies to implement and adjust to those changes. The legislation will alter the ways in which banks do businesses in multiple respects: whether banks can conduct certain lines of business; how that business will be accomplished under changed circumstances; and, in some cases, how much they can charge for the products and services they are allowed to provide. Going forward, the OCC will look for opportunities to work with peer regulators, industry leaders, consumer advocates, and policymakers to advance appropriate legislative initiatives and reduce regulatory burden.

Technology

Responsive, stable, and secure information technology capabilities are essential to the OCC's mission. To meet the broad demands of all internal and external stakeholders, the OCC must provide expertise, capabilities, and services in systems development and support. In addition, the agency must meet the needs for data, information, and knowledge management; collaboration

and information sharing; telecommunications and network support; enterprise-wide security operations; technical support; and incident management. The foundation of the OCC's information technology service delivery approach comprises effective and reliable information technology infrastructure, information sources, and business solutions, reflecting a multi-year information technology strategy that will

- provide fault-tolerant infrastructure for OCC business solutions and critical services, including e-mail.
- create a single, integrated data architecture and provide end-user access to current, historic, and forecast information for banks.
- provide access to business solutions, information, and services using reliable desktop, laptop, and hand-held devices that meet or exceed business performance requirements.
- focus solution development resources and activities on data collection, data management, and data analysis and visualization, supporting bank supervision.
- streamline the OCC's application portfolio to remove redundant capabilities resulting from combined OCC–OTS operations, and retire end-of-lifecycle applications, reducing operating costs and reallocating resources to priority business requirements.
- realign the OCC's staff profile, training, and skills with its target architecture and information technology road map, creating an agile, responsive workforce to fulfill mission requirements.

The OCC recognizes the threat that information security breaches represent to consumers, bank systems, and public confidence. The OCC regularly monitors bank compliance with laws and regulations, shares best practices, and takes enforcement actions to ensure compliance. In addition, the OCC ensures compliance with the Federal Information Security Management Act (FISMA) and executes initiatives to strengthen the internal security of sensitive information.

Appendixes

Appendix A: Strategic Management Process

The OCC's Executive Committee members discuss programmatic and management issues during its regular meetings and at the annual planning retreat. These discussions may lead to revising strategic initiatives or result in new short- or long-term initiatives. In many cases, these issues are assigned to the subcommittees of the Executive Committee (Committee on Bank Supervision; Financial Reform Oversight Group; Budget and Finance; Human Capital; Technology and Systems; and Enterprise Governance) to further define the initiatives and actions to be taken.

Short-term actions can either modify the OCC's current-year activities or serve as the basis for planning and budgeting for the subsequent year. Longer term initiatives are used to update the strategic plan. Generally, strategic discussions include the following:

- An analysis of the condition of the banking industry, emerging issues and products in the financial services market, structural changes in the marketplace for financial services, legislative developments, an assessment of the competitiveness of national banks and federal savings associations in the evolving marketplace for financial services, and an evaluation of significant consumer financial services issues.
- An evaluation of the existing risk profile and emerging risks in the banking industry, the large bank portfolio, and the midsize and community bank portfolio.
- An assessment of internal strengths and weaknesses and a review of resource management issues, such as human capital, financial resources, technology, and fixed assets.
- The integration of feedback from agency stakeholder groups and program evaluations.

Coordinated by the OCC's Ombudsman, the strategic goals, objectives, and strategies are reviewed, validated, and revised as necessary. The Ombudsman works through the various subcommittees of the Executive Committee or their designees to update or identify new goals, objectives, and strategies. The Comptroller and Executive Committee approve the final *OCC Strategic Plan*.

The goals, objectives, and strategies in the *OCC Strategic Plan* are further refined into activities to be accomplished annually. This is documented in the OCC Annual Performance Budget, functional operating plans, and ultimately employee performance plans. This process is the means of communicating the strategic direction and ensuring accountability for achieving goals and objectives throughout the organization. Annual performance goals and measures are established to monitor program accomplishments.

Appendix B: Relationship Between the OCC’s and Treasury Department’s Strategic Goals

The following table depicts the relationship between the OCC’s strategic goals and measures and the Treasury Department’s strategic goals and high-priority performance goals.

Treasury Department’s Strategic Goals	The OCC’s Strategic Goals	The OCC’s Annual Performance Measures
1. Repair and reform the financial system 2. Enhance economic growth, competitiveness, and sustainability <u>High-Priority Performance Goal</u> <u>Fiscal Years 2012 and 2013:</u> Increase small business access to capital 4. Combat illicit financial activity to advance national security and the integrity of the financial system	I. A safe and sound system of national banks and federal savings associations	A. Percentage of national banks and federal savings associations that are categorized as well capitalized B. Percentage of national banks and federal savings associations with composite CAMELS rating of 1 or 2 C. Rehabilitated national banks and federal savings associations as a percentage of the problem banks and federal savings associations one year ago (CAMELS 3, 4, or 5)
	II. Fair access to financial services and fair treatment of national bank and federal savings association customers	Percentage of national banks and federal savings associations with consumer compliance rating of 1 or 2 <i>For institutions with assets over \$10 billion these ratings reflect only those laws and regulations for which the OCC has enforcement and supervisory authority.</i>
	III. A flexible legal and regulatory framework that enables national banks and federal savings associations to provide a full, competitive array of financial services consistent with statutory and prudential safety and soundness constraints	Percentage of licensing applications and notices completed within established time frames
5. Foster a prudent use of taxpayer resources to operate the federal government	IV. A competent, highly motivated, and diverse workforce that makes effective use of OCC resources	Total OCC costs relative to every \$100,000 in assets regulated

Appendix C: Program Evaluations

Both internal and external program evaluations are used to assess whether OCC programs are achieving their intended results in a cost-effective manner. The results of these reviews are used to revise existing or to identify new program objectives and strategies in the *OCC Strategic Plan*. Generally, the schedule for internal program evaluations is developed annually, with additional evaluations initiated as warranted.

Internal Program Evaluations

The OCC's formal program evaluation efforts include

- Departmental Quality Management programs.
- the Self-Assessment for Managers Questionnaire.
- the Financial Reporting Internal Controls Program.
- Office of the Ombudsman programs.
- the Licensing Customer Satisfaction Feedback Program.

Departmental Quality Management Programs. All Executive Committee-level department heads established quality management programs in their respective areas of responsibility and annually certify that

- programs achieve their intended results.
- resources align with the mission and strategic plan.
- resources are protected from waste, fraud, and abuse.
- laws and regulations are followed.
- reliable and timely management information systems support decisions.

Self-Assessment for Managers Questionnaire. The annual questionnaire reminds managers of established OCC operating policies and secures a self-assessment of their level of compliance with those policies.

Financial Reporting Internal Controls Program. The Financial Management Department oversees the documentation of key processes of financial reporting and testing of the related internal controls. The results of these reviews enhance internal controls and support the Comptroller's assurance statement required by the Office of Management and Budget (OMB) Circular A-123, Appendix A. Assessment of the effectiveness of internal controls over financial reporting is completed annually.

Office of the Ombudsman Programs. The Ombudsman provides program-level information for the strategic management process through its administration of the bank appeals process, the customer assistance program, and ongoing examination questionnaires provided to bank chief executive officers for feedback on the quality of OCC supervision. Program evaluation activities are continual.

The Enterprise Governance Division reports to the Ombudsman and is subject to the oversight of the Enterprise Governance Subcommittee. The division is responsible for administering a quality management framework for the OCC. For each OCC department-level unit, Enterprise Governance

- documents the department's goals and objectives and related measures.
- documents the processes and systems the department uses to measure and monitor achievement of the goals and objectives.
- verifies that structured and unstructured quality management activities are completed.
- documents the department's assessment as to whether each goal and objective was effectively achieved.

The Enterprise Governance program supports the annual departmental certifications and the Comptroller's annual assurance statement.

Licensing Customer Satisfaction Feedback Program. Each recipient of an OCC corporate decision is surveyed to obtain customer service feedback regarding the timeliness of application processing, staff professionalism, courtesy, knowledge of the licensing process, availability of electronic filing, and the quality of written OCC guidance. Program evaluation activities are continual.

External Program Evaluations

In addition to the OCC's ongoing internal program evaluation efforts, the OCC receives program-level feedback from the following external sources:

- Office of the Inspector General (OIG), Department of the Treasury
- Office of the Special Inspector General for the Troubled Asset Relief Program (SIGTARP), Department of the Treasury
- U.S. Government Accountability Office (GAO)
- Independent certified public accountant

Office of the Inspector General. The OIG conducts reviews of OCC operations every year. The results from the OIG program and compliance audits provide useful input into the OCC strategic management process.

Office of the Special Inspector General for the Troubled Asset Relief Program. SIGTARP was established by the Emergency Economic Stabilization Act of 2008 (EESA). Under EESA, the Special Inspector General conducts, supervises, and coordinates audits and investigations of the purchase, management, and sale of assets under the Troubled Asset Relief Program (TARP).

U.S. Government Accountability Office. The GAO conducts targeted reviews of OCC regulation and supervision of banks.

Independent certified public accountant. Every year, the OCC commissions the services of an accounting firm to conduct a financial statement opinion audit and to provide senior management with conclusions on the effectiveness of the OCC's program of financial controls.