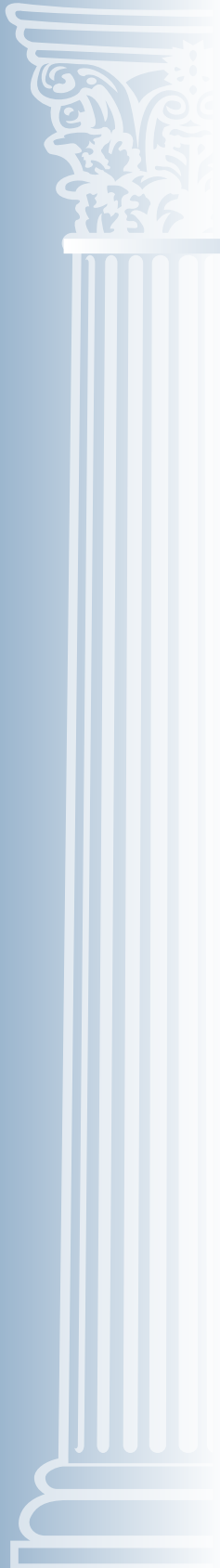




Comptroller of the Currency
Administrator of National Banks



OCC Strategic Plan

FISCAL YEAR 2007–2012

Table of Contents

A Message from Comptroller Dugan.....1

The OCC Today2

OCC’s Mission and Vision3

Strategic Goals, Objectives, and Strategies3

A Safe and Sound National Banking System3

Fair Access to Financial Services and Fair Treatment of Bank Customers.....5

A Flexible Legal and Regulatory Framework that Enables the National Banking System to Provide a Full Competitive Array of Financial Services5

An Expert, Highly Motivated, and Diverse Workforce that Makes Effective Use of OCC Resources6

Key Factors Affecting the Achievement of Strategic Goals.....9

Appendices

A – Strategic Management Process11

B – Relationship between OCC and Treasury Department Goals12

C – Program Evaluations13

D – Relationship between Strategic and Information Technology Goals.....15

Comments or questions can be sent to the Office of the Comptroller of the Currency, Mailstop 4-5, 250 E Street SW, Washington, DC 20219 Attention: Susan Chew or by e-mail to susan.chew@occ.treas.gov.

A Message From Comptroller Dugan

The OCC's Strategic Plan for FY 2007 – 2012 articulates our agency's long range goals, discusses how we intend to accomplish those goals, and addresses the circumstances that could affect their implementation. I am pleased to present this plan, which, in addition to offering a direction for the OCC's future, aims to impart a clearer understanding of our mission and our methods.

Since becoming Comptroller in August 2005, I have been very impressed by the skill and dedication of the OCC staff. They are responsible for the OCC's exemplary record of success, both past and present.

Today, banking assets under OCC supervision are at a historic high. The OCC is a supervisor – and an employer – of choice in the financial regulatory field. The national banking system is safe and sound, and we are working hard every day to make certain that it stays that way.

Although this is an agency with a long and distinguished history – now more than 143 years – the OCC has achieved its current status by looking forward, not backward. That is why this Strategic Plan is so important. An organization like ours, which supervises institutions whose business is managing risk, must address the risks we face in our own operations, and must anticipate and prepare for the challenges that lie ahead.

That is what we have tried to do in these pages. Our Strategic Plan addresses the growing complexity of our largest banks. It addresses the growing importance of retail banking, with its consumer protection implications, for all national banks. It reflects the increasing role that the OCC and all financial regulators play in the nation's war on terrorism. And it tackles our human capital challenge, which will require sustained focus on the recruitment and retention of qualified individuals to replace the large number of OCC employees who will be reaching retirement age during the period covered by this Strategic Plan.

I applaud the hard work and creative thinking that have gone into this Strategic Plan, and thank the OCC professionals who have contributed to it. I believe that it positions the OCC well for the future.



John C. Dugan
Comptroller of the Currency

March 15, 2007

The OCC Today

The OCC is responsible for ensuring a safe and sound national banking system for all Americans. This is accomplished through the effective licensing, regulation, and supervision of federally chartered banks. The operations of the OCC are primarily funded by semiannual assessments levied on national banks.

Currently, the OCC supervises approximately 1,849 institutions with national bank charters and 50 federal branches of foreign banks in the United States. National bank assets total approximately \$6.6 trillion dollars or 67 percent of total U.S. commercial banking assets.

The OCC has approximately 3,000 employees in locations throughout the U.S. 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 Office of the Ombudsman is located in Houston. The OCC also operates field offices and satellite locations in cities throughout the United States, resident examiner teams in the largest banking companies, and an examining office in London, England.

Condition of the National Banking System

The national banking system has enjoyed strong earnings growth over the last five years. Net income and return on equity have remained near record levels, after adjusting for the effects of recent mergers. Banks have used part of these increased earnings to further strengthen capital, which has also reached record levels.

Gains in net interest income have come largely from loan growth, especially from fast growth in residential and commercial mortgages; sustained increases in property prices have fueled much of this growth. Above-average growth in deposits has kept the cost of funds relatively low, adding to net interest income. Noninterest income has grown even faster than net interest income, thus becoming more important for banks' financial results. Much of the gain in noninterest income has come from growth in securitization income, from income from service charges and other fees, and, at the largest banks, from trading income.

Brisk growth in the U.S. economy has added to bank earnings, as a strong economy encourages firms to expand, thus stimulating the growth of domestic lending, and at the same time reducing the number of bad loans in the system. Better economic growth overseas has also contributed to U.S. bank earnings, in part by stimulating the demand for U.S. goods and services.

Credit quality is very good. Rising corporate profits and stronger corporate balance sheets produced a notable improvement in the performance of commercial and industrial loans. At the same time, rising property prices helped push down the noncurrent loan ratio on the retail side. As a result, credit quality is near its historical peak, allowing banks to reduce the amount they set aside to cover future loan losses.

OCC's Mission and Vision

Mission

Ensuring a safe and sound national banking system for all Americans.

Vision

The OCC seeks to assure a banking system in which national banks soundly manage their risks, maintain the ability to compete effectively with other providers of financial services, meet the needs of their 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, Objectives, and Strategies

The OCC has four strategic goals:

- I. A safe and sound national banking system.
- II. Fair access to financial services and fair treatment of bank customers.
- III. A flexible legal and regulatory framework that enables the national banking system to provide a full competitive array of financial services.
- IV. An expert, 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 our operational processes, skills, technologies, and resources to achieve our strategic goals and objectives.

Strategic Goal I: A safe and sound national banking system.

Strategic Objective 1: Risks to the national banking system are anticipated, understood, addressed, and conveyed to national banks.

- A. Ensure risk-based supervision is properly executed and focused on systemic and bank-specific risks.
- B. Identify new products and services, and emerging risk areas, including those related to operational and technology-related vulnerabilities, and adjust supervisory strategies and activities as appropriate.
- C. Comply with the examination schedule requirements of the Federal Deposit Insurance Corporation Improvement Act (FDICIA).

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- D. Resolve problem bank situations in a timely fashion, effectively, and when possible, without loss to the insurance fund.
 - E. Conduct 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 enforce anti-money laundering and anti-terrorism statutory and regulatory requirements.
 - F. Conduct quality assurance reviews to ensure that policies and procedures are applied consistently.
 - G. Incorporate applicable lessons learned from recent natural disasters/emergencies and continue to conduct periodic system-wide reviews and testing.
 - H. Provide an independent appellate process for national banks.
 - I. Administer educational programs for bankers and bank directors.
 - J. Assess the continued relevance of the current supervisory lines of business.

Strategic Objective 2: U.S. and international financial supervisory authorities cooperate on common interests.

- A. Work effectively with U.S. regulators to identify and address risks and emerging issues (this includes the Comptroller serving on the board of directors of the Federal Deposit Insurance Corporation).
- B. Participate in joint supervisory programs, including the Shared National Credit (SNC) Program, Interagency Country Exposure Review Committee (ICERC), and the interagency examination program for multi-regional data processing servicers (MDPS).
- C. Represent the OCC's interest on interagency groups, including the Federal Financial Institutions Examination Council (FFIEC), Basel Committee on Banking Supervision, Joint Forum, Financial Stability Forum (FSF), Financial Banking and Infrastructure Information Committee (FBIIC), Bank Secrecy Act Advisory Group, and the National Interagency Bank Fraud Working Group.
- D. Ensure that Basel II and Basel IA capital rule implementation embodies standards appropriate for the U.S. banking system.
- E. Implement existing and develop new coordination and collaboration agreements with the various federal regulators regarding supervisory activities performed in national banks and with foreign regulators regarding supervisory activities and information exchange.

Strategic Objective 3: Supervisory methods and analytical tools keep pace with industry changes.

- A. Deploy supervisory technology solutions to achieve better data quality, enhance early detection of problems and risks, modernize tools for examination support, and provide user-friendly examiner access to key bank and industry information.

Strategic Goal II: Fair access to financial services and fair treatment of bank customers.

Strategic Objective 1: All customers have fair access to financial services and are treated fairly.

- A. Identify risk factors through statistical analysis, supervisory assessments, and analysis of Home Mortgage Disclosure Act (HMDA) data to enhance fair lending examinations.
- B. Continue to take a lead role in addressing predatory lending practices, customer privacy, information security, and identity theft requirements.
- C. Reinforce 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 and state agencies.

Strategic Objective 2: National banks are involved in community and economic development activities.

- A. Support the efforts of national banks to engage in sound and successful community development activities.
- B. Provide consultations for bankers on the effective implementation of the Community Reinvestment Act, including the new community development test for intermediate small banks.
- C. Participate on the Financial Literacy and Education Commission to modify and implement the national strategy.
- D. Participate constructively in interagency community and economic development activities.

Strategic Goal III: A flexible legal and regulatory framework that enables the national banking system to provide a full competitive array of financial services.

Strategic Objective 1: Each OCC regulation is current, clearly written, and necessary for an effective supervisory process.

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- A. Review and revise OCC regulations to further streamline, reduce burden, and reflect new developments.
 - B. Provide regulatory support for Basel II and Basel IA capital rulemaking.

Strategic Objective 2: The OCC supports national banks' efforts to remain competitive, consistent with safety and soundness.

- A. Support continued recognition of the preemptive attributes of the national bank charter through appropriate opinions, regulations, and participation in litigation where warranted.
- B. Develop and modernize national bank charter attributes and the role and status of the national banking system.
- C. Enhance communications with state authorities to facilitate better coordination on state law issues affecting national banks.
- D. Ensure that regulations applicable to national banks facilitate their involvement in community and economic development activities.
- E. Communicate attributes of the national bank charter and developments concerning national banks' activities within the OCC and externally.

Strategic Objective 3: Licensing procedures are efficient and consistent with safety and soundness.

- A. Review licensing policies and procedures to provide clear and comprehensive guidance.
- B. Implement and maintain processes for early screening of licensing applications and authorization requests.
- C. Deploy new or enhance existing technology solutions that support effective licensing operations.

Strategic Goal IV: An expert, highly motivated, and diverse workforce that makes effective use of OCC resources.

Strategic Objective 1: An expert, motivated, and diverse workforce is maintained in a fair and inclusive work environment.

- A. Maintain a comprehensive Human Capital Strategic Plan that includes the agency's diversity goals and objectives.
- B. Continue to execute external hiring strategies to augment specialized skills to enhance the OCC's supervision of complex banking activities and organizations.

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- C. Continue executing the OCC's aggressive recruiting and comprehensive training strategy for new entry level examiners.
 - D. Execute proactive initiatives focused on the retention of employees, including mentoring, employee feedback, employee outreach, incentives, and recognition programs.
 - E. Improve on-line training opportunities for bank examiners and other OCC staff.
 - F. Ensure management succession through leadership development programs.
 - G. Continue the specialty skills assessment program to identify and develop examiners in the areas of asset management, bank information technology, capital markets, compliance, commercial lending, mortgage banking, retail lending, and operations risk.
 - H. Implement the Large Bank Supervision Apprentice Program to increase the pool of candidates and fill skill gaps.
 - I. Develop and implement a centralized pre-commission training tracking system.

Strategic Objective 2: The OCC is an efficient, effective, and ethical organization.

- A. Ensure compliance with laws, regulations, and stewardship of OCC resources through program evaluations and a management accountability program.
- B. Ensure compliance with the rules, policies, and procedures for ethical conduct by OCC employees.
- C. Assure reliable, secure, modern information technology (IT) systems and environment that meet the OCC's mission, goals, and objectives.
- D. Improve the effectiveness and integration of the current IT governance structures, policies, processes, and procedures.
- E. Deploy enterprise services to leverage technology and standard capabilities across the OCC with particular focus on information management initiatives such as document, content, records, and knowledge management.
- F. Ensure existing technology that adds business value is properly maintained while re-engineering or implementing new systems where appropriate.
- G. Achieve increased efficiency and improved effectiveness by converting the information technology infrastructure from the mainframe platform.

Strategic Objective 3: The OCC's resource decisions and operations reflect sound financial, security, and risk management principles.

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- A. Implement security controls commensurate with risk to protect sensitive, private, and classified information.
 - B. Improve contingency planning for business continuity, including information technology recovery strategies, compliance with homeland security requirements, and crisis management strategy.
 - C. Improve the enterprise identity management program and ensure compliance with homeland security requirements, presidential directives, and e-Government initiatives.
 - D. Achieve reliable, accurate, and timely human and financial resources management information through enhanced internal controls.
 - E. Use 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 could affect achievement of our strategic goals and program objectives. These factors fall into four broad categories: economic, human capital, legislative, and technological.

Economic

Shifts in the national and global economies can significantly affect the risk profiles of national banks and corresponding OCC supervisory strategies. Uncertainties in the financial and commodities markets and in the global political landscape are likely to continue and may result in a more volatile operating environment for the banking industry.

Continued loosening of credit underwriting and pricing standards heightens concerns about credit quality and may escalate problem credits and losses in the event of unfavorable market developments. Slowdowns in the housing, construction, and real estate development markets may adversely affect banks' balance sheets and earnings streams. National banks are now more retail- and consumer-focused in their business, thus accentuating the need for strong and integrated compliance programs. Many banks and over-leveraged consumers remain vulnerable as interest rates rise. Pressures on net interest margins are likely to continue. Merger and acquisition activity has fostered a growing concentration of banking assets in the largest national banks and reduced the number of major dealers in key derivatives and money markets.

Rapid changes in the economy and financial services market could outpace our ability to provide timely training, tax our examination resources, and place greater pressure on our systemic risk analysis function.

Human Capital

As is the case throughout the federal government, over the next five years the number of OCC employees eligible for retirement will increase significantly, including those holding key leadership positions. The OCC faces the challenge of competing for, training, and then retaining resources to build the workforce of the future. Changing national and local economies that influence employment markets could affect the OCC's ability to recruit as successfully as our needs dictate as well as to retain the technical expertise and leadership skills required for key positions.

Legislative

Legislative changes could alter the way national banks conduct business and may require new rulemakings or supervisory initiatives to address new powers or business models. Legislative changes also affect the OCC's outreach programs with bankers, consumers, and community groups by creating the need for more outreach activities and the distribution of informational and educational materials.

Technological

Rapid change in the banking industry's use of technology requires the OCC's information technology to be flexible and adaptive with the optimal blend of security, stability, and responsiveness. To meet the technology demands of customers and stakeholders, the OCC must have broad capabilities and skills in many disciplines, including systems development and support, telecommunications and network support, technical and help-desk support, and outsourcing management. The OCC is working to leverage enterprise capabilities in Web content management, document management, records management, knowledge management, identity management, notification services, expansion of communication channels, and enterprise-wide security operations.

The growing recognition that standard functions are shared by federal agencies government-wide is leading to standardization and shared services of common business functions such as payroll, travel, and learning management. The OCC is participating in a wide range of government-wide efforts, which when successfully implemented will change the nature of IT in the federal workplace.

The OCC requires the effective implementation of information technology to accomplish its strategic goals. The OCC's information technology organization is committed to the implementation of an Information Technology Services strategic plan that will:

- Ensure IT investments are linked to the technology direction of the agency,
- Provide the agency technology roadmap to the future, and
- Meet growing demands for secure, reliable technology solutions to support the OCC's mission.

The OCC faces the challenge of continuing to leverage technology for increased efficiencies in operations and for improved responsiveness in deploying resources in the areas of greatest risk.

The OCC recognizes the threat that information security breaches represent to consumers, the national banking system, and public confidence. The OCC regularly monitors bank compliance with laws and regulations in this area, passes on best practices, and takes enforcement actions to ensure compliance. The OCC ensures compliance with the Federal Information Security Management Act and has a number of initiatives to strengthen internal security of sensitive information.

Appendix A: Strategic Management Process

The Executive Committee routinely discuss programmatic and management issues during its meetings. 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; Regulatory Policy, Legal and External Affairs; Budget and Finance; Human Capital; Technology and Systems; and Audit) to further define the initiatives and actions to be taken.

Short-term actions can either modify the current year's 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 national banking system, 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 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 national banking system, the large bank portfolio, and the mid-size/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 Senior Deputy Comptroller for Management/Chief Financial Officer, the strategic goals, objectives, and strategies are reviewed, validated, and revised as necessary. The Senior Deputy Comptroller for Management/Chief Financial Officer 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 Strategic Plan.

The goals, objectives, and strategies in the OCC Strategic Plan are further refined into activities to be accomplished on an annual basis. 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 our goals and objectives throughout the organization. Annual performance goals and measures are established and reported to monitor program accomplishments.

Appendix B: Relationship between OCC and Treasury Department Goals

The strategies outlined in the OCC Strategic Plan will be implemented through the annual integrated planning, budgeting, and evaluation process. We will develop and use annual performance goals that are linked to our strategic goals and objectives. By maintaining a relationship between our strategic plan, our annual performance budget, and our employee performance management system, we focus on activities that support our strategic goals while also contributing to the accomplishment of the goals and objectives of the Department of the Treasury. The following table depicts the relationship between the OCC's strategic goals and annual performance goals to the Department of the Treasury's strategic goals and objectives.

Treasury Strategic Goal: Conditions that promote prosperous and stable U.S. and world economies.		
Treasury Strategic Objective: Improved economic opportunity, mobility and security with robust, real, sustainable economic growth at home and abroad.		
OCC Strategic Goal	OCC Annual Performance Goal	OCC Annual Performance Measure
I. A safe and sound national banking system.	A. Ensure a well-capitalized national banking system. B. Ensure a safe and sound national banking system through effective supervision. C. Achieve effective rehabilitation of problem national banks.	A. Percentage of national banks that are categorized as well capitalized B. Percentage of national banks with composite CAMELS rating of 1 or 2 C. Rehabilitated national banks as a percentage of the problem banks one year ago (CAMELS 3, 4 or 5)
II. Fair access to financial services and fair treatment of bank customers.	Ensure a national banking system that effectively complies with consumer laws and regulations.	Percentage of national banks with consumer compliance rating of 1 or 2
III. A flexible legal and regulatory framework that enables the national banking system to provide a full competitive array of financial services.	Issue licensing decisions that assure national banks are safe and sound, competitive, and profitable.	Percentage of licensing applications and notices completed within established time frames
Treasury Strategic Goal: Management and organizational excellence.		
Treasury Strategic Objective: Enabled and effective Treasury Department.		
OCC Strategic Goal	OCC Annual Performance Goal	OCC Annual Performance Measure
IV. An expert, highly motivated, and diverse workforce that makes effective use of OCC resources.	Achieve effective and efficient supervision, regulation, and chartering of national banks.	Total OCC costs relative to every \$100,000 in bank assets regulated

Appendix C: Program Evaluations

Both internal and external program evaluations are used to evaluate 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 on an annual basis, with additional evaluations initiated as issues that warrant review are identified.

Internal Program Evaluations

The OCC's formal program evaluation efforts include:

- Departmental Quality Assurance Programs,
- Self-Assessment for Managers Questionnaire,
- Enterprise Governance Program,
- Financial Reporting Internal Controls Program,
- Office of the Ombudsman, and
- Licensing Customer Satisfaction Feedback Program.

Departmental Quality Assurance Programs. All Executive Committee-level department heads establish quality assurance programs in their respective areas of responsibility and annually certify that:

- Programs are achieving their intended results,
- Resources are aligned with our mission and strategic plan,
- Resources are protected from waste, fraud, and abuse,
- Laws and regulations are being followed, and
- Reliable and timely management information systems support decisions.

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

Enterprise Governance Program. The Program and Management Accountability (P&MA) Office reports to the Comptroller's Chief of Staff and is subject to the oversight of the Audit Subcommittee. This office oversees the assurance facet of the overall enterprise governance program. Annual Executive Committee members' certifications are validated and tested through P&MA participation in bank supervision quality assurance activities and/or district and field office site visits to test quality assurance program scope and effectiveness, as well as procedural engagements initiated by an Executive Committee member.

Financial Reporting Internal Controls Program. The Financial Management Division oversees the documentation of key processes over financial reporting and testing of the related internal controls. Documentation and initial testing were completed in FY 2006. 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 control over financial reporting is completed annually.

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

Licensing Customer Satisfaction Feedback Program. Each recipient of an OCC corporate decision is surveyed to obtain customer service feedback regarding 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, we receive program-level feedback from external sources:

- Department of the Treasury Office of Inspector General (OIG),
- United States Government Accountability Office (GAO),
- Office of Management and Budget, and
- Independent Public Accountant.

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

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

Office of Management and Budget. In Fiscal Year 2002, OMB implemented a formal assessment program in support of the budget and performance integration initiative of the President's Management Agenda. The OCC was included in the first 20 percent of federal programs reviewed using OMB's Program Assessment Rating Tool (PART). These program assessments are made every five years.

Independent 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 regarding the effectiveness of the OCC's program of financial controls.

Appendix D: Relationship between Strategic and Information Technology Goals

OCC Strategic Goals and Objectives	OCC Information Technology Strategic Goals			
	Strengthen customer relationships	Provide technical leadership and IT governance for better overall IT decision-making	Deliver quality products and services, and assure a reliable, secure, and modern IT environment	Assure a competent, high-performing workforce
I. A safe and sound national banking system.				
1. Risks to the national banking system are anticipated, understood, addressed, and conveyed to national banks.	√	√		
2. U.S. and international financial supervisory authorities cooperate on common interests.	√	√		
3. Supervisory methods and analytical tools keep pace with industry changes.	√	√		
II. Fair access to financial services and fair treatment of bank customers.				
1. All customers have fair access to financial services and are treated fairly.	√	√		
2. National banks are involved in community and economic development activities.	√			
III. A flexible legal and regulatory framework that enables the national banking system to provide a full competitive array of financial services.				
1. Each OCC regulation is current, clearly written, and necessary for an effective supervisory process.	√	√		
2. The OCC supports national banks' efforts to remain competitive, consistent with safety and soundness.	√	√		
3. Licensing procedures are efficient and consistent with safety and soundness.	√	√		
IV. An expert, highly motivated, and diverse workforce that makes effective use of OCC resources.				
1. An expert, motivated, and diverse workforce is maintained in a fair and inclusive work environment.			√	√
2. The OCC is an efficient, effective, and ethical organization.			√	√
3. The OCC's resource decisions and operations reflect sound financial, security, and risk management principles.		√		√