



Comptroller of the Currency  
Administrator of National Banks

US Department of the Treasury

# Office of the Comptroller of the Currency Report of the Ombudsman



*People serving people,  
one customer at a time*

A photograph of an office environment with several cubicles. In the foreground, a man in a striped shirt is seen from the back, wearing a headset. In the middle ground, a woman is smiling at a computer monitor. In the background, another woman is working at a desk. The cubicles are equipped with desks, computers, and various office supplies.

## Mission of the Office of the Ombudsman

The Office of the Ombudsman is organized around core principles of dispute resolution and customer service. The office seeks to ensure that national banks and customers of national banks receive fair and expeditious resolution of their complaints through two distinct processes within the office. The National Bank Appeals Process is designed to resolve disputes of national banks arising from the supervisory process. The Customer Assistance Group's focus is to ensure that customers of national banks receive fair treatment resolving their complaints with national banks.

### About the cover:

Across front and back: Snapshots of Ombudsman staff members.  
Bottom front: Customer Assistance Group call queue display.  
Bottom back: [www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov) home page.

# Report of the Ombudsman

2005–2006



Office of the Comptroller of the Currency

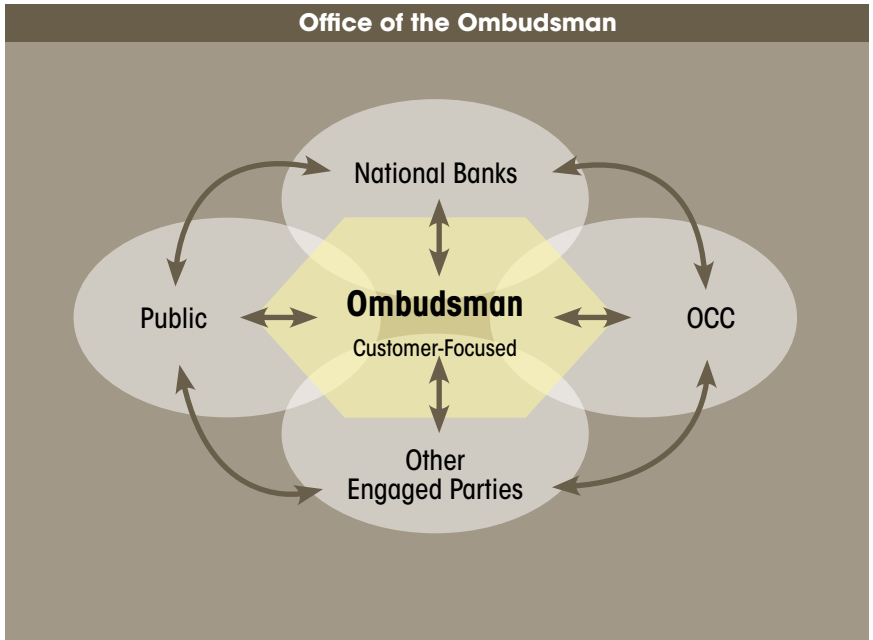
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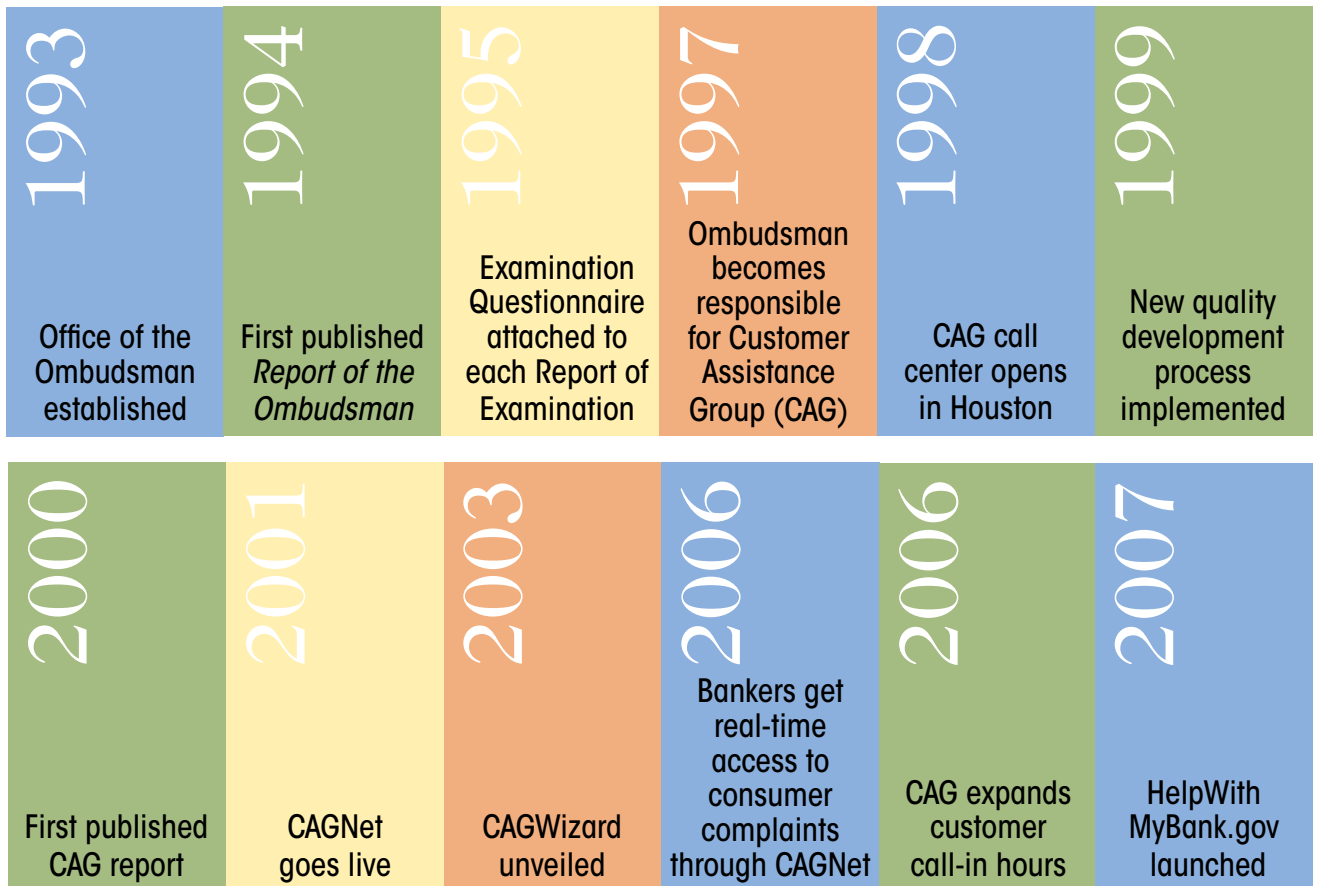


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## Timeline



# Message from the Ombudsman

All of us in the OCC's Office of the Ombudsman are here to provide service.

We are here to provide service to consumers when they have problems with national banks. We answer their questions, provide them with advice, investigate their complaints, and do our utmost to achieve outcomes that are fair and satisfactory to all concerned. When consumers contact us about institutions that aren't national banks and therefore not regulated by the Office of the Comptroller of the Currency (OCC), we try to be helpful by pointing them to the right agency to get help in resolving their problems.

We are also here to provide service to other parts of the OCC. Our analysis of complaint data provides an early warning of emerging trends that helps shape regulatory policy and improves the agency's ability to supervise the national banking system.

Our service can also provide benefits to the national banks supervised by the OCC. We act as an independent sounding board for bankers, serve as an arbiter when they have complaints or concerns about OCC bank supervision, and provide them with feedback based on aggregate consumer complaints received about particular banks.

Our mission of service is reflected in the theme for this 2005–2006 *Report of the Ombudsman*: “People serving people, one customer at a time.” Inside the report, you'll find important information about our Customer Assistance Group (CAG), which helps individual consumers who have questions or complaints about their banks. You'll also find detailed discussions of the National Bank Appeals Process, our Examination Questionnaire, and the contributions our office makes every day to help consumers and improve the quality of service provided by banks in the national banking system.

## PART I: OVERVIEW



**TO MAKE THE BEST USE  
OF OUR PEOPLE AND  
THEIR EXPERTISE, WE  
GIVE THEM THE LATEST  
TECHNOLOGIES AND THE  
LATITUDE THEY NEED**



The key to our customer service is the dedication and skill of the staff of the Ombudsman’s Office. We are proud of our people—the men and women of the OCC who patiently listen and sort through the voluminous complaint data that comes their way. They are the people who explain the often complex rules and regulations governing bank transactions, and they are the ones who strive every day to inspire confidence in consumers and bankers about the fairness of the process.

To make the best use of our people and their expertise, we give them the latest technologies and the latitude they need, not just to get the job done, but to go the extra mile for those who need our help.

When the OCC established this office in 1993 and appointed me as the agency’s first ombudsman, our overriding mission was to provide bankers with an independent venue to challenge agency decisions without fear of retribution. We continue to offer that critically important service today. In fact, we are the only banking regulatory agency that has a truly independent supervisory appeals process administered by an ombudsman with decision-making authority. But it’s clear that the responsibility of responding to consumer complaints continues to grow steadily in importance and requires the resources we devote to that responsibility to grow accordingly.

CAG is the arm of the Ombudsman’s Office charged with assisting in performing this task. CAG staff answers calls, reads letters, and reviews e-mail messages from consumers, and then seeks to facilitate the resolution of questions and problems. In each of the last two years, approximately 70,000 bank customers brought questions or complaints to CAG.

During this period, we have also established a satellite call center, a facility we call “CAG North.” There, CAG customer service representatives act as the first point of contact for bank customers with questions and problems.

This advanced call center has allowed us to expand our operating hours, so that anyone calling from Monday through Friday, from 7



a.m. to 7 p.m. (Central Time), can be assured that one of us—not just a computer menu—will be available to help.

Delivering quality customer service also means communicating with an increasingly diverse public. Several of our CAG specialists are multilingual. We have issued a version of our popular CAG brochure in Spanish and we provide customer assistance information in Spanish on the OCC's Web site.

Another area important to us is working with state banking regulators. The responsibility for bank regulation in America is divided among federal and state agencies, and bank customers often do not know which agency supervises their financial institution—they only know they have a question or problem and need help.

As a result, the CAG receives numerous inquiries and complaints from customers of banks that the OCC does not regulate. The same is true for other bank regulators at the federal and state levels. Our practice has been to refer complaints to the appropriate agencies. However, that process has been time consuming and hobbled by privacy restrictions and the lack of an effective system for following up on the outcome of referred cases.

To facilitate communication and customer service, while at the same time protecting customer privacy, the OCC and the Conference of State Bank Supervisors (CSBS) worked together to forge a model Memorandum of Understanding for Sharing Consumer-Complaint Information in November 2006. A majority of states have already entered into agreements with us based on this model, and we expect many more states to follow. As a result of our work, consumers across America stand to benefit from a simpler, more seamless process for filing complaints about their banks. I am pleased with this initiative; it clearly evidences a commitment to consumers by both the OCC and the CSBS.

Regulatory agencies can and must work together and when hurricanes Katrina and Rita struck vast areas of the Gulf Coast and beyond in 2005, we did. I am proud of the contributions of our staff members during those difficult days and in the weeks following. CAG served as a point of contact and information

DELIVERING QUALITY  
CUSTOMER SERVICE ALSO  
MEANS COMMUNICATING  
WITH AN INCREASINGLY  
DIVERSE PUBLIC

center for bankers and customers trying to determine whether their banks were open for business and, if not, where they might turn for emergency funds. We worked closely with state agencies to coordinate the flow of information and prevent bureaucratic obstacles from obstructing recovery efforts.

In late 2006, we conducted our first customer satisfaction survey. We are reviewing results to glean suggestions on how to better serve our customers. We plan to conduct additional surveys, then analyze trends to spot areas needing improvement and identify best practices.

We also developed a new Web site—[www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov)—that will help bank customers identify the regulatory agency with oversight of their particular bank and also provide educational information about banking rules and regulations, operating subsidiaries of national banks, and other banking-related issues.

I also want to express my appreciation to our international colleagues, particularly the financial services ombudsmen in the United Kingdom, Canada, the Republic of Ireland, and Australia, who similarly labor in this business of providing quality services to people having difficulties with, or complaints against, financial institutions. The benefits of these collaborative relationships are multifaceted, and are a source of knowledge and growth.

I recently announced my plans to retire in February 2008. One of the distinct privileges of my 30-plus years at the OCC has been to work alongside the dedicated employees of the Ombudsman's Office to help thousands of Americans find the assistance they need. It is a mission that we pursue with enthusiasm and vigor, each and every day, and in the years to come.



Samuel P. Golden,  
Ombudsman

# Profile

The Office of the Ombudsman has changed significantly over its 13-year life, evolving from a unit exclusively focused on appeals and complaints by national banks about the OCC’s supervisory process to one that devotes the bulk of its resources to problems experienced by bank customers.

The Ombudsman’s Office has a highly skilled staff with broad expertise in areas that include banking laws and regulations, customer service, quality assurance, and data analysis. They are supported with leading-edge technology that has not only made it possible to serve more customers, but has turned complaint data into a valuable resource for both the OCC and national banks.

Analysts in the Ombudsman’s Office in Houston search the data for early warnings of trends that require regulatory or supervisory action, and provide information to national banks that can help them fix problems in their customer service. In addition to facilitating resolutions of individual complaints, the Ombudsman and his staff provide banks with detailed reports about consumer complaint trends at their institutions and show them how their complaint portfolios compare with their peers.

The Office of the Ombudsman provides service to OCC bank supervision and millions of consumers who depend on the national banking system to purchase homes, cars, and groceries; start small businesses; put their children through college; and go about their everyday lives.

**THE OMBUDSMAN’S OFFICE  
HAS A HIGHLY SKILLED  
STAFF WITH BROAD  
EXPERTISE IN AREAS  
THAT INCLUDE BANKING  
LAWS AND REGULATIONS,  
CUSTOMER SERVICE,  
QUALITY ASSURANCE, AND  
DATA ANALYSIS**

Office of the Ombudsman Senior Leadership Team



**Samuel P. Golden**  
*Ombudsman*



**Maria D. Olguin**  
*Senior Advisor*



**Craig Stone**  
*Deputy Ombudsman  
for Customer  
Assistance*



**Patricia A. Limbrick**  
*Executive Assistant*

As national banks have increased their emphasis on retail products and services, the Office of the Comptroller of the Currency has stepped up its efforts to ensure fair treatment for all national bank customers. At the big-picture, “macro” level, OCC compliance examiners help to make sure that national banks follow the laws and rules that were adopted to protect banking consumers, from laws and rules about truth in lending to the Equal Credit Opportunity Act. But in a \$6.5 trillion system that serves hundreds of millions of customers, individual situations that require special attention are likely to arise, even in the best banks with the strongest commitment to customer service. That’s where the OCC’s Customer Assistance Group, or CAG, comes in.

Approximately 70,000 bank customers contact CAG each year. Some of these contacts involved simple issues that could be handled through a single telephone call such as questions about check hold times. Others were considerably more complex, such as the situation a New York man found himself in when he left a hospital after recovering from open heart surgery, only to find that \$11,000 had been improperly withdrawn from his money market account. After the bank initially refused to provide restitution, CAG got involved at the customer’s request and ultimately facilitated full restitution by the bank.

The money returned was part of the \$8 million in financial compensation CAG helped return to national bank customers last year. (See Figure 1: Estimated Compensation to Customers, 2002–2006.) Most compensation amounts were small—the median was \$146 in 2006—but these amounts are important to bank customers who believe they have been treated unfairly.

As one person put it in a letter to CAG, “\$647.23 may not seem like a lot of money, but it was to me at the time. One of the best things [in life] is people helping other people, people treating other people how they want to be treated—with kindness and respect.” (See “A Day in the Life of a CAG Specialist.”)

## PART II: CUSTOMER ASSISTANCE GROUP

**APPROXIMATELY 70,000  
BANK CUSTOMERS CONTACT  
CAG EACH YEAR**



Rayburn Johnson, a 20-year OCC veteran with seven years of experience in customer assistance

## A Day in the Life of a CAG Specialist

The calls, an average of 70,000 annually for the past two years, begin the same way.

“Hello, thank you for calling the Office of the Comptroller of the Currency’s Customer Assistance Group. How can I help you today?”

At one end of the phone line is a bank customer—usually, but not always, a national bank customer—that has turned to the OCC for assistance with a question or a problem. At the other end is a member of OCC’s Customer Assistance Group, greeting the caller with an offer of assistance.

“It’s about trying to help as much as you can,” said Vonda King, a customer assistance specialist in Houston. Callers are often frustrated and emotional, but it’s the job of the specialist to listen to the caller, understand the issue, and provide counsel on what to do.

Rayburn Johnson, a 20-year OCC veteran with seven years of experience in customer

assistance, knows that patience is important. Mr. Johnson said he never gets tired of working with national bank customers.

“Lots of times, folks just want to tell you the whole story and that’s part of the process,” he said.

“It’s always great when you can assist customers in getting a fee or charge refunded, but that’s not always the solution,” added another specialist, Alicia Loya. “It just comes down to doing what’s right.”

“At the end of the day, there’s a lot of satisfaction because the consumers appreciate the effort,” said Howard Greene, also a customer assistance specialist.

And just as the calls to CAG begin with the same words, most of them end with a similar valediction: “Glad we could assist you today.”

## Handling Complaints

The best way to resolve a complaint is usually through direct talks between the customer and the bank—and that’s the first course of action CAG recommends. “Fair dealing with customers and prompt resolution of their problems is, first and foremost, the bank’s responsibility,” said Comptroller of the Currency John C. Dugan in a January 2007 speech. “The bank plainly has a strong interest in resolving complaints, and it typically has the resources and knowledge to do so, much more efficiently than we can. Moreover, in addition to the compliance, legal, and reputation

**FIGURE 1**  
**Estimated Compensation to Customers, 2002–2006**



Note: Median amount of compensation per case in 2006 was \$145.00.



## Comptroller Draws Attention to CAG's Skilled People and Effective Technology

Comptroller of the Currency John C. Dugan used his first speech of 2007 to highlight the mix of technology and skilled personnel that make the OCC's Customer Assistance Group effective in helping consumers with problems and complaints.

In his speech, the Comptroller noted that CAG handles an average of 70,000 contacts a year and returned nearly \$30 million to national bank customers over the last five years. His multimedia presentation also showed that CAG has assembled an "integrated system of skilled people and effective technology to address customer concerns."

By walking through the complaint process, Comptroller Dugan highlighted details of each step of the process: listening carefully to each caller, advising callers of their rights under the law, explaining how to work with a bank, and if warranted, how to file a formal complaint.

He also demonstrated different ways that the OCC uses complaint data to improve the system. For example, such data help examiners develop examination strategies and annual risk assessment plans, and help the OCC identify trends, in the industry or at an

individual bank, that suggest problems. The Comptroller also discussed how information from complaints contributes to the development of policy and guidance and supports enforcement actions against institutions participating in unfair or deceptive practices.

"When we see individual complaints or patterns of complaints that could indicate inappropriate or unfair or deceptive practices, OCC lawyers are called in," the Comptroller said. "We can, and we have, taken enforcement action to correct practices that we found to be unfair or deceptive."

In addition to putting CAG data directly to work in supervision, the OCC uses information it develops for another important purpose as well: to provide aggregate feedback to banks that helps them identify retail practices that need improvement. CAG's staff regularly meets with senior management at national banks to show how their institution stacks up against the competition with respect to consumer complaints, the Comptroller said.

"On occasion it has been CAG data provided by the OCC that first alerted a bank management team to an emerging issue," he added.



risks that complaints raise, banks understand that having unhappy customers is simply not good business.”

However, when it’s appropriate for customer assistance specialists to intervene with a bank, they do so with knowledge and training. Most senior CAG specialists are commissioned National Bank Examiners or have received a Certified Regulatory Compliance Manager (CRCM) designation from the American Bankers Association.

They are also backed by sophisticated technology that makes it possible for them to help more national bank customers each day. For example, CAG’s state-of-the-art case management application facilitates the process of opening cases and makes it easier for CAG specialists to manage a case every step of the way. The electronic case file includes records of every contact with the customer, including copies of faxes, letters, and e-mails.

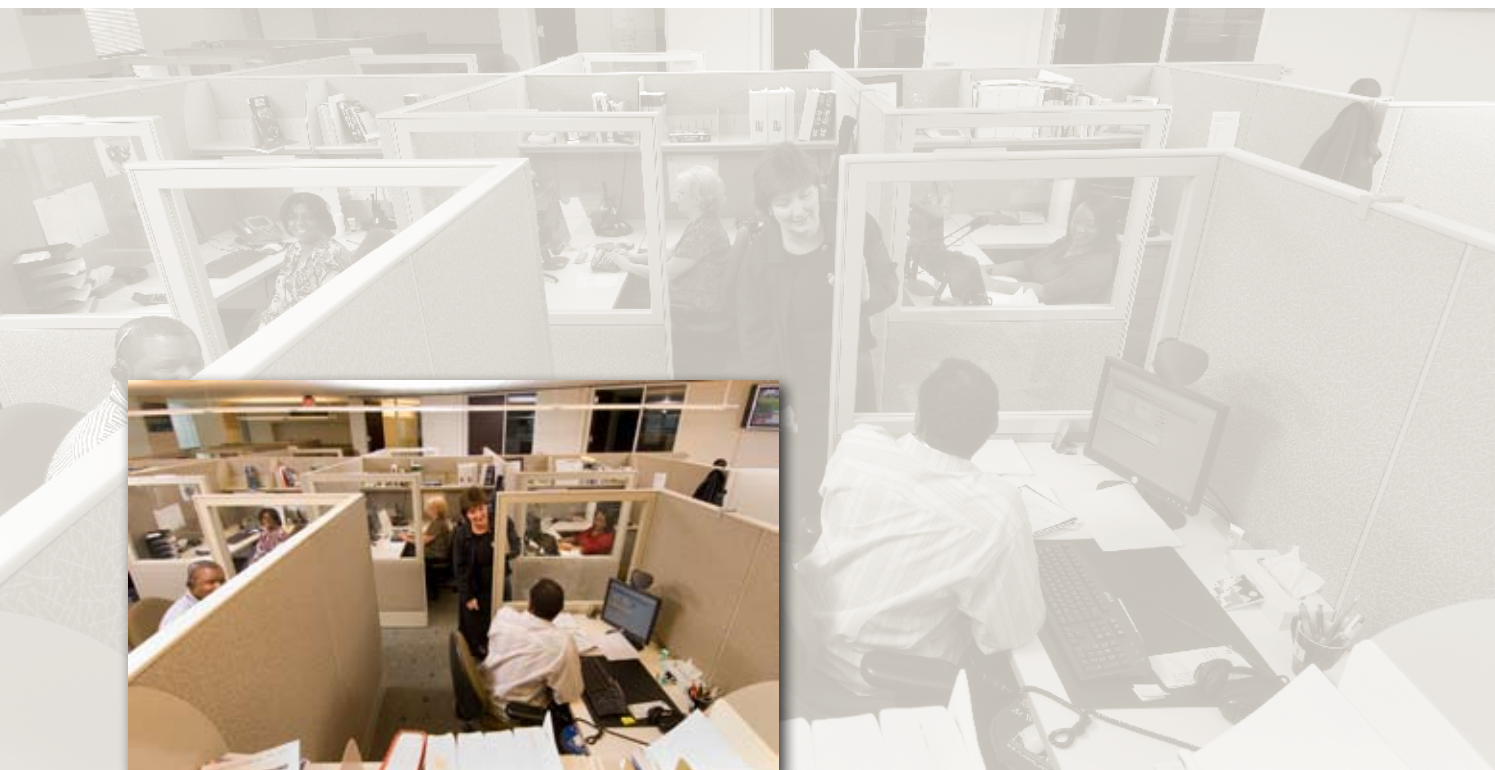
Likewise, contacts with banks have been streamlined through the use of CAGNet, a secure, Web-based system that allows the OCC and banks to communicate electronically. National banks can log in to CAGNet to see summaries of all pending complaints and provide responses to CAG on individual cases.

When called upon to help customers understand the applicable banking laws and advise them of their rights, CAG specialists have the background to provide reliable information. Moreover, CAG works closely with the OCC’s Law Department to address complaints that raise substantive legal questions.

CAG also addresses complaints about illegal discrimination. Complaints alleging violations of the Equal Credit Opportunity Act and Fair Housing Act usually involve applications for credit cards and mortgages, and a bank’s evaluation of those applications. Bank customers are typically unfamiliar not only with the provisions of these laws, but also with the standards that banks use to evaluate creditworthiness. If a CAG specialist has reason to believe discrimination may have occurred, the matter

CAG HAS EXPANDED  
ITS HOURS, IMPROVED  
THE EFFICIENCY  
OF ITS OPERATIONS,  
AND ENHANCED THE  
TECHNOLOGY IT USES  
TO TRANSMIT CONSUMER  
COMPLAINTS TO BANKS





## The Customer Assistance Group Expands Customer Access

The OCC's Customer Assistance Group (CAG) is open for business 12 hours a day, five days a week. As a result, from 7 a.m. to 7 p.m. Central Time, Monday through Friday, consumers with concerns or complaints can call and speak to a CAG representative.

The expanded hours were made possible through the use of telecommunications technology and a new relationship with an experienced vendor. Leveraging this technology with professional call center practices, CAG can better fulfill its mission. CAG also has the flexibility to extend its hours or add capacity during a natural disaster.

Deputy Ombudsman for Customer Assistance Craig Stone, who oversees CAG, said the expanded hours have proven important to many national bank customers.

"The issue isn't so much that we're able to field complaints that might not have gotten to us under the old system," said Mr. Stone, because "people

who reach us after hours leave messages or send e-mails. What's important, though, is that when something goes wrong with your credit card or mortgage loan, you want to talk to someone right away. You don't want to have to wait until the next business day. And if that problem crops up at 6:30 p.m. Central Time, we have customer assistance specialists available to help."

"We are proud of what we have accomplished to date in building an integrated system of skilled people and effective technology to address customer concerns," said Comptroller of the Currency John C. Dugan.

"We think we've done a good job in developing the technology and the people we need to serve national bank customers with questions and complaints, but that job never stops," said Mr. Stone. "We're always looking for ways to improve, and expanding our call hours is only one example of that."

is referred to the appropriate OCC supervisory office as well as the agency's Community and Consumer Law Division. Under a Memorandum of Understanding, CAG also refers certain mortgage loan discrimination complaints to the Departments of Justice and Housing and Urban Development.

Sometimes bank customers present problems that do not lend themselves to resolution by CAG, such as issues involving contract disputes. In these cases, CAG specialists may advise the customer to consider retaining legal counsel, but that's always a last resort. CAG specialists are often able to resolve differences in a way agreeable to both the customer and the bank.

## **CAG Improves Customer Service**

In the last two years, CAG has expanded its hours, improved the efficiency of its operations, enhanced the technology it uses to transmit consumer complaints to banks, developed a process to ensure that complaints sent to the wrong agency are directed to the right one, and launched a special Web site for customers of national banks ([www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov)).

### ***New Call Center Improves CAG's Coverage, Efficiency***

Perhaps the most significant improvement in recent years was the establishment in 2006 of a satellite call center and the expansion of CAG hours. As a result, consumers who have problems with their banks can now reach a CAG representative 12 hours a day, five days a week (7:00 a.m. to 7:00 p.m., CT, Monday through Friday). (See "The Customer Assistance Group Expands Customer Access" for more about the move to expanded hours.)

The satellite call center uses time-saving tiered service. At the first tier, the customer service representatives provide information on basic banking questions. More complex questions, unique issues, and foreign-language calls are

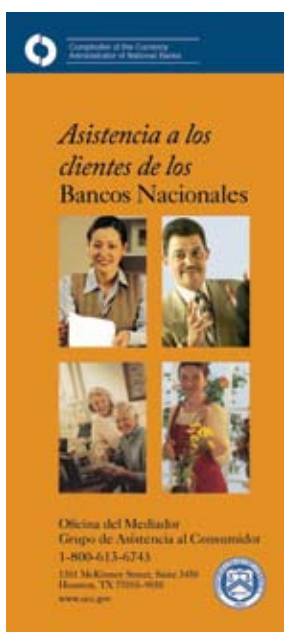
**“The bank removed the questionable file from my credit reports. OCC has helped me tremendously. My credit report looks great. Last month my husband and I were able to purchase our home.”**



transferred to the second tier, where they are handled by more experienced or bilingual customer assistance specialists.

CAG also enhanced its self-service telephone menu in early 2006. Without having to speak with a specialist, consumers can obtain basic information such as CAG's address, instructions for filing a complaint, and contact information for other bank regulatory agencies.

**"Gracias por llamar a la Oficina del Contralor de la Moneda.  
Mi nombre es Eloisa. ¿Qué es su nombre, por favor?"**



This is what you might hear when you reach one of our Spanish-speaking customer assistance specialists. Between 2005 and 2006, the CAG office handled more than 1,900 calls from Spanish-speaking national bank customers trying to resolve problems or file complaints.

In 2006 the OCC published the "Assistance for Customers of National Banks" brochure in Spanish: "Asistencia a los clientes de los Bancos Nacionales." From the brochure, customers with problems and complaints about national banks learn how best to resolve them. CAG also has specialists who speak French as well as Russian.

The OCC also provides a variety of information in Spanish on its Web site, [www.occ.gov](http://www.occ.gov).



## Financial Regulators Forge a Formal Agreement To Share Complaint Data

Even the most financially literate Americans sometimes have trouble determining who regulates their depository institution. Is it a bank? A thrift? Is the institution chartered by a state agency or by the federal Office of the Comptroller of the Currency?

The OCC and the Conference of State Bank Supervisors (CSBS) believe consumers shouldn't have to know the answer to those questions. Any banking agency they deal with ought to answer it for them.

That simple concept was embodied in a template for information-sharing agreements. This template was designed to be used as the basis for individual agreements between the OCC and state banking departments.

On November 30, 2006, Comptroller of the Currency John C. Dugan and then New York Banking Superintendent Diana L. Taylor inked the first such agreement. It was quickly followed by many others, with over a majority of states entering into such agreements by the fall of 2007.

"We are pleased to be the first state to sign an MOU with the OCC to ensure consumer complaints are addressed by the appropriate supervisory agency," said Superintendent Taylor at the signing ceremony. "This agreement is an important first step between the New York State Banking Department and a federal bank regulator to enhance cooperation in the area of consumer protection."

Recognizing that consumers do not always know which regulatory agency—state or federal—supervises their bank, the OCC-CSBS template provides model procedures to ensure that misdirected complaints are sent to the appropriate agency. The agreement provides for an exchange of data, protects the privacy of customers, and allows the state officials to receive status reports about the complaints they refer.

"The real winners here are consumers, who should not be expected to know which regulatory agency to send a complaint to when they run into problems," Comptroller Dugan said.

Each year the OCC refers thousands of complaints to other state and federal regulators and receives thousands more from other agencies about national banks.

Handling this volume of referrals requires collaboration that goes beyond a simple formal agreement, and the OCC began work in 2006 on the technology to electronically route misdirected complaints. The enhanced capabilities will allow the OCC and participating states to exchange information electronically, cutting down on paper mail and faxes, and speeding service to bank customers. The new system, dubbed "Complaint Referral Express," continued in development, with testing early in 2007 and full implementation planned by mid-year 2008.

**“I wish to express my gratitude for all the help I have received from [you]. With your help, we received [a refund of \$7,100 incorrectly deducted from] our account. What a nice surprise to come into on Monday morning! [This] would not have happened without your office’s help.”**

### *Enhanced Complaint-Sharing Technology*

Recently, CAG has undertaken two initiatives to improve the consumer complaint process, not just for national banks and their customers, but for customers of other banks as well.

The first of these initiatives is an improvement to our Web-based system known as CAGNet—a system that manages and delivers information about consumer complaints to national banks—all electronically. In January 2006, CAG enhanced CAGNet to deliver complaint data to bank managers in near real-time. Today, 91 percent of bank customer complaints to CAG are transmitted to banks by CAGNet. Using CAGNet, bankers send CAG a written explanation of how each complaint was resolved. The OCC is the only bank regulatory agency to apply technology in this way.

The other initiative involves our working with state and other federal regulators. One of the most common difficulties that bank customers face when seeking help with a problem is identifying the regulatory agency that oversees their institution. As mentioned earlier, complaints about national banks are often filed with state banking authorities, and complaints about state-chartered banks are often lodged with the OCC. Although state agencies and the OCC voluntarily forward misdirected complaints, delays often result.

Working together, the OCC and the Conference of State Bank Supervisors developed a model Memorandum of Understanding (MOU) that streamlines the way states and the OCC exchange customer complaint information. The model MOU provides a template for agreements between the OCC and individual states. (See “Financial Regulators Forge a Formal Agreement To Share Complaint Data.”)

### *A Web Site Just for Consumers*

In 2006 the Ombudsman’s Office developed a new Web site for bank customers: [www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov), (launched in July 2007). This site provides a wealth of information for consumers,

including frequently asked questions that deal with problems consumers have with banks, and also provides an electronic complaint form. In addition, the site includes resources to help individuals determine which agency supervises their bank and provides contact information for other regulators.

While the site is intended to serve customers of national banks, it provides answers to questions of interest to all bank consumers. The information provided by the site comes from OCC experts based on answering nearly 70,000 consumer questions each year.

The OCC will continue to enhance the site while working with other agencies to create a one-stop source of help for customers

## Update—Just Launched! HelpWithMyBank.gov Serves Bank Customers



In July 2007, the Office of the Comptroller of the Currency launched the [www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov) Web site to assist customers of national banks with questions and concerns.

“We created HelpWithMyBank.gov with national bank customers in mind,” Comptroller of the Currency John C. Dugan said. “Our goal was to build a site that makes it easier for people to get answers and submit concerns about their bank because we are committed to ensuring fair access to financial services and equal treatment for bank customers.”

“HelpWithMyBank.gov answers common questions that appeal to all bank consumers, not just customers of national banks,” said OCC Ombudsman Samuel P. Golden. “The information provided by the site comes from OCC experts based on answering nearly 70,000 consumer questions each year.”

HelpWithMyBank.gov covers topics that include credit cards, interest rates, check cashing, late payments, mortgages, and many others.

In addition to answering banking questions, HelpWithMyBank.gov provides useful information about how to determine whether a bank is a national bank and how to contact regulators of institutions other than national banks.

“The OCC will continue to enhance HelpWithMyBank.gov with information and more helpful features,” said Comptroller Dugan. “It is my hope that we can work with other banking regulators to expand this effort to support all bank customers.”

of all banks, thrifts, and credit unions. (See “Update—Just Launched! HelpWithMyBank.gov Serves Bank Customers.”)

### *Customer Survey*

The CAG conducted its first customer satisfaction survey in late 2006 and the response was positive. Although we are still reviewing the comments and suggestions in detail, the public rated the initial point of contact at CAG higher than the government average. Also, as one would expect, those consumers who received the relief they requested reported high overall satisfaction with their CAG experience, while those who did not obtain their requested relief were less satisfied—and of course, CAG cannot always provide the relief requested by the consumer.

THE CAG CONDUCTED  
ITS FIRST CUSTOMER  
SATISFACTION SURVEY  
IN LATE 2006 AND THE  
RESPONSE WAS POSITIVE

### **CAG Services Affect People’s Lives**

Even before the advent of deposit insurance, the OCC protected national bank customers by examining institutions for safety and soundness. As important as that work is to bank customers, it takes place out of the view of consumers.

By contrast, CAG specialists touch the lives of bank customers in a much more visible way. They talk to thousands of customers each year, hearing their problems, dispensing advice, discussing directly with banks where necessary, and facilitating resolutions that benefit both banks and their customers, when possible.

“Each question or complaint that comes into CAG is important to us, whether it involves \$5 or \$5,000,” said Mr. Golden.

Among the national bank customers CAG helped last year was an American citizen living overseas who learned during a visit home in March 2006 that her money market deposit account had been emptied out.

Her bank said it could find no record of an account in her name. When she presented evidence of her account information, the bank investigated and notified her a week later that the account had been closed in December because of a negative balance. Account statements showed that over a seven-month period,



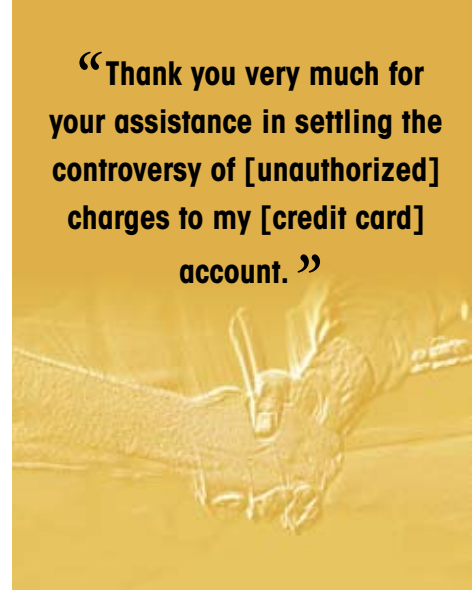
the account was depleted through numerous debit card/ATM withdrawals and telephone transfers. The withdrawals, totaling more than \$290,000, represented her entire life savings.

Initially, her bank denied her claim for restitution, contending that under law she had only 60 days to file a claim. The customer filed a written complaint with the OCC, and CAG asked the bank to explain how it had complied with Regulation E in determining the amount of the customer's liability. More specifically, CAG asked the bank to consider the length of time during which the transactions occurred, along with the timing of the customer's notification to the bank. In June, the bank wrote to its customer and the OCC stating they had reconsidered their earlier denial of her fraud claim. The result: the customer received reimbursement totaling more than \$291,000, including interest and fees. Obviously, not every complaint we receive is resolved with such a positive outcome for the consumer, but this is one example where our facilitation role helped persuade the bank of the merits of the consumer's complaint, regardless of the applicable legal standard.

In another such case, a New Orleans resident contacted OCC about a \$500 prepayment penalty he was charged for paying off a mortgage on a house destroyed by Hurricane Katrina. The bank contended that his mortgage contract called for a prepayment penalty if the loan was paid in full within 30 months of its origination. Since his papers were destroyed in the hurricane, he could not verify this statement, and he asked for CAG's help in getting a copy of the mortgage contract and a waiver of the prepayment penalty.

CAG forwarded the complaint to the bank on behalf of the consumer. The bank researched the account and concluded that the assessment of the prepayment penalty was legitimate, since it was specifically provided for in the contract. However, after the CAG pointed out the circumstances that led to the consumer prepaying the loan, the bank refunded the \$500 as a gesture of goodwill.

**“Thank you very much for your assistance in settling the controversy of [unauthorized] charges to my [credit card] account.”**



Again, not all complaints reach such resolutions, and indeed, most turn on an understanding of the fundamental legal rights and responsibilities of the bank and the customer. Nevertheless, as these examples show, there are instances in which CAG's attention to an issue has made the bank aware of other issues involved—including the bank's reputation—that have led to a favorable resolution for the consumer.

## Complaint Case Load and Trends

The number of bank customers who contact the CAG fluctuates, but typically totals between 60,000 and 70,000 per year. (See Figure 2: Total Case Volume, Inquiries and Complaints, 2002–2006.)

The contacts come from all 50 states, Puerto Rico, and U.S. territories by telephone, e-mail, and letter. In 2006, the CAG handled almost 62,000 calls, of which about 28,000 were complaints. Figure 3 illustrates the percentage of complaints arising from each state or U.S. territory in 2006.

Each contact with CAG is recorded as a case. Some cases are simple inquiries; others are formal complaints. An inquiry is a question that can be related to a bank product or service. Complaints, which must be signed, are written expressions of dissatisfaction with bank products, services, or actions.

FIGURE 2

Percent of Total Complaints, by State or Territory, 2006

Shows distribution across nearly every state and territory

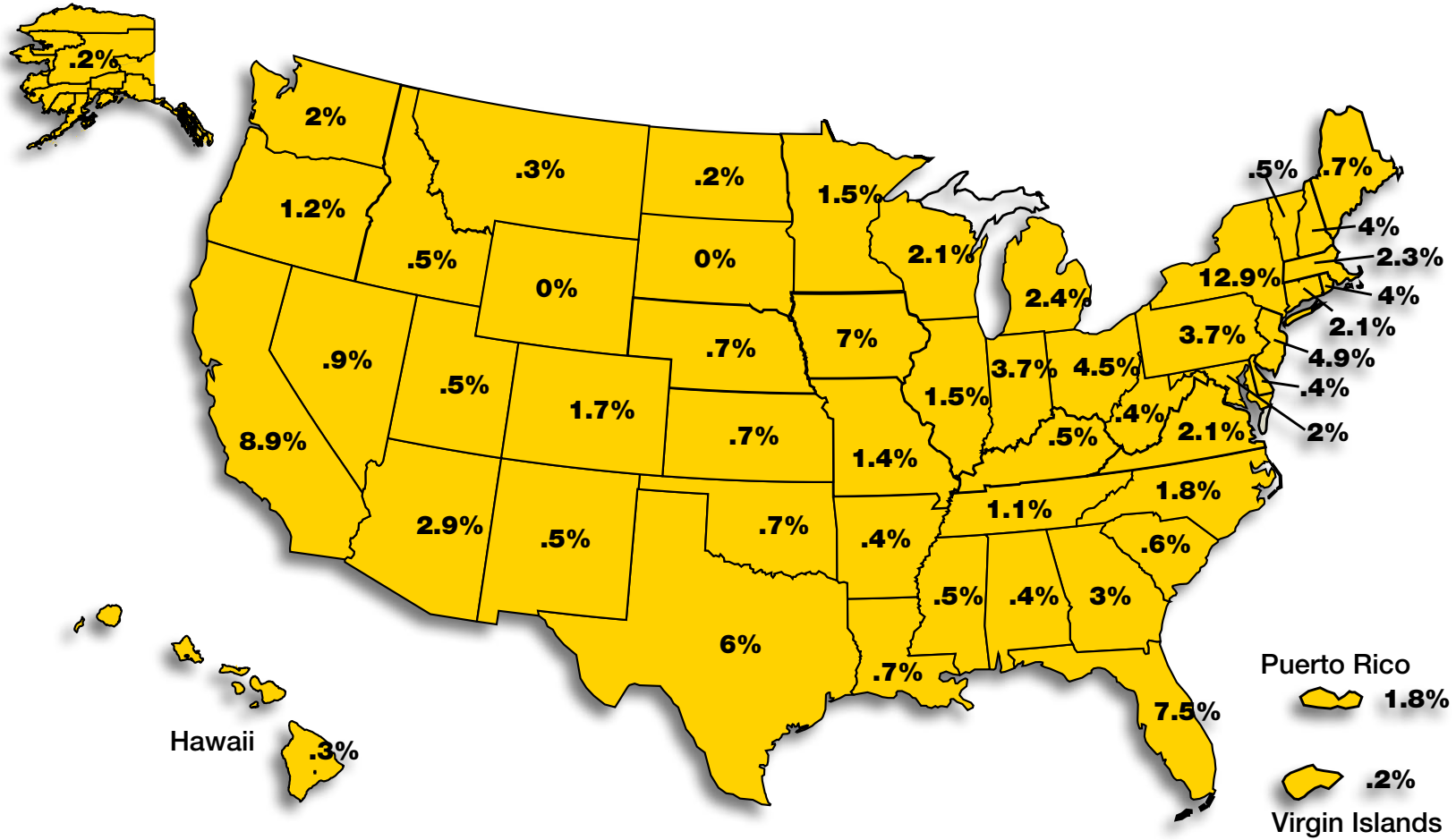
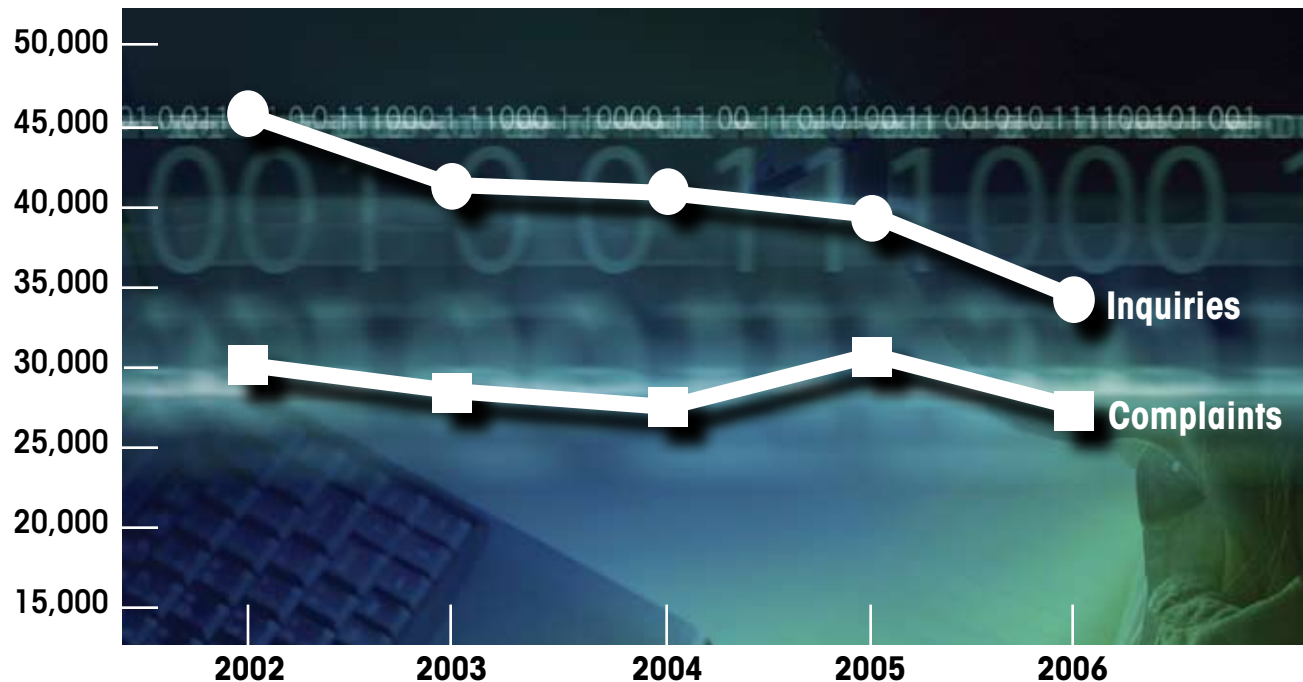


FIGURE 3

Total Case Volume, Inquiries and Complaints, 2002–2006



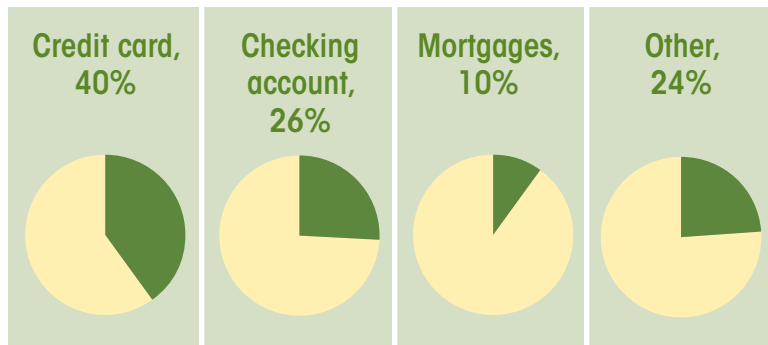
### *Trends*

Historically, credit card issues top the list of complaints received by CAG, with disputes about checking accounts ranking second. The third largest category of complaints relate to mortgages. Together, these three categories account for more than three-fourths of all complaints. (See Figure 4: Complaints by Major Product, 2002–2006.)

*Credit Cards.* More than half of credit card complaints relate to the Truth in Lending Act, which requires disclosure to customers of specific credit card terms, such as fees and conditions that can result in interest rate increases. Disputes also arise about billing errors, poor customer service, debt collection practices, equal credit opportunities, credit reporting, changes in bank policies on

FIGURE 4

### Complaints by Major Product, 2002–2006



Note: Total number of complaints for 2002–2006 is 147,440.

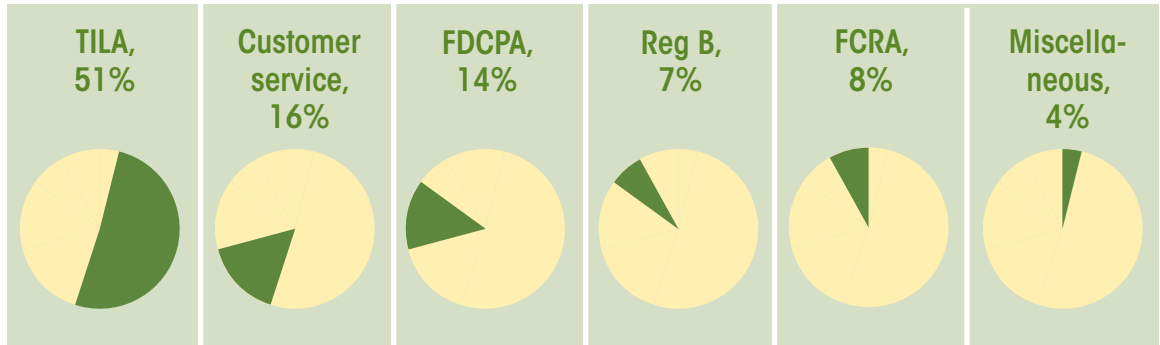
grace periods, late payments, and minimum monthly payments. (See Figure 5: Credit Card Complaints, 2002–2006.)

Consistent with the mission of the Ombudsman’s Office, CAG specialists provide informal education to bank customers about truth-in-lending rules on account disclosures, finance charges, and other credit terms. CAG specialists review account disclosures with bank customers, explain the terms clearly, and answer questions. In addition, our experience suggests that poor customer service often involves a breakdown in communication between customers and bank employees.

Debt collection practices are an increasing source of complaints. The most common grievances include excessive phone calls, debts that are not owed, and attempts to collect more than is due. CAG specialists inform bank customers of their rights under the Fair Debt Collection Practices Act. They also foster exchanges of information between customers and banks about the validity and propriety of collection efforts.

FIGURE 5

**Credit Card Complaints, 2002–2006**



Note: Total number of credit card complaints for 2002–2006 is 58,919.

TILA = Truth in Lending Act

FDCPA = Fair Debt Collection Practices Act

Reg B = implements Equal Credit Opportunity Act

FCRA = Fair Credit Reporting Act

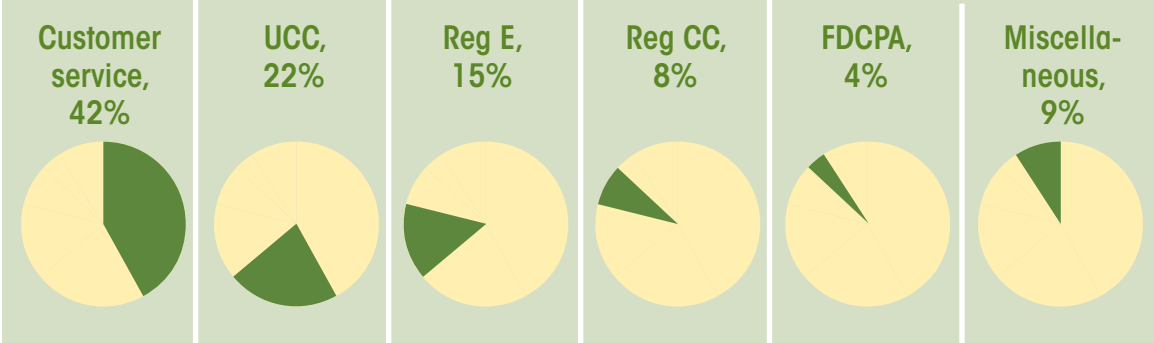
*Checking Accounts.* Checking accounts are also a major source of customer complaints or concerns, which is not surprising given the high number of transactions associated with this banking product. Poor customer service ranks first among such complaints, usually related to bank charges, check processing, and poor communication. (See Figure 6: Checking Account Complaints, 2002–2006.)

To resolve misunderstandings about deposit processing and check clearing, CAG specialists explain to customers that these issues may not be covered by laws or regulations, but by the Uniform Commercial Code (UCC) and bank policies.

CAG specialists also work to resolve complaints about unauthorized transfers or fraudulent transactions using customers’ automated teller machine (ATM) cards, issues that are governed by the Electronic Funds Transfer Act.

In the past two years, the CAG has noted a significant increase in complaints about counterfeit checks, which have caused significant losses to banks and their customers. Both the Availability of Funds Act (Regulation CC) and the UCC govern complaints about the negotiation and collection of checks and drafts in commercial business transactions, sales contracts, and agreements. Other common disputes involve lost and forged instruments, stop payment orders, and contractual disputes. The UCC is not widely understood by the general public, so CAG acts as liaison between bank customers and their banks to address these issues. In some instances, CAG advises customers to seek legal assistance in resolving complaints.

**FIGURE 6**  
**Checking Account Complaints, 2002–2006**



Note: Total number of checking account complaints for 2002–2006 is 38,741.

UCC = Uniform Commercial Code

Reg E = implements the Electronic Fund Transfer Act

Reg CC = Part 229—Availability of Funds and Collection of Checks

FD CPA = Fair Debt Collection Practices Act

**“I received a full credit of \$5,292.61 from my bank. Your services are imperative to hard-working consumers who trust establishments to abide by simple rules of integrity and the law. Thank you again for your concern, prompt attention, and professionalism.”**

### *CAG Supports Bank Supervision*

From analyses of complaint data, CAG identifies trends and lessons that are valuable to the OCC's supervision of the national banking industry. Data derived from the CAG process plays an important role in identifying problems—at a particular bank or in a particular segment of the industry—that may warrant further investigation by examination teams, supervisory guidance to address emerging problems, or enforcement action.

Through an internal, Web-based system called CAGWizard, CAG analysts extract complaint data, sort and analyze the information, and generate custom reports that bank examiners use regularly in their examinations of individual banks.

The CAG also identifies complaint trends for individual products such as home mortgages and credit cards. Senior OCC leaders review these trends when forging the agency's supervisory strategies. When complaints about specific products and practices increase or when complaints about a particular bank multiply, this information can be used to focus the OCC's supervisory activities. This increased supervisory attention helps ensure fair treatment of bank customers and, in extreme cases, can lead to enforcement actions against the bank.

Analysis of CAG complaint data is also important to the development of OCC guidance on consumer compliance issues. For example, CAG data has contributed to the following guidance:

- OCC Bulletin 2005-9, “Overdraft Protection Programs: Interagency Guidance” (April 6, 2005).
- OCC Consumer Advisory “Gift Cards: OCC Provides Holiday Tips for Consumers,” attached to News Release 2004-108 (December 7, 2004).
- OCC Advisory Letter 2004-8, “Servicemembers Civil Relief Act” (June 18, 2004).



## **CAG Outreach**

The CAG management team hosts formal and informal meetings with banking associations, consumer advocacy groups, and state regulatory authorities to promote strong working relationships, to share best practices, and to strengthen risk identification measures. The team also participates in external conferences to provide educational material on the CAG and increase awareness of its activities.



## **The National Bank Appeals Process: Ensuring Fair Treatment for National Banks**

The Ombudsman, who reports directly to the Comptroller, serves as an objective arbiter to resolve bank appeals independently of the OCC's supervisory departments, through the National Bank Appeals Process. This process is designed to provide banks with an independent, fair, and binding means of settling disagreements that can arise from OCC supervisory actions or decisions.

National banks can make informal inquiries or file formal appeals in the strictest confidence without fear of retaliation.

Before the establishment of the Ombudsman's Office in 1993, national banks could appeal supervisory actions or decisions to the supervisor of the bank examiner who handled the examination or another official in the agency's bank supervisory framework. Although bank executives still have that option—and the Ombudsman's Office encourages bankers to use it—that sole avenue of appeal was not always conducive to the full airing and expeditious resolution of the issues.

The process also provides a valuable service to the OCC by identifying areas of bank supervision that can be improved.

### **How the Process Works**

As part of the examination process, the OCC assigns ratings on the overall condition of each national bank and, sometimes, a banker disagrees with a rating. A bank executive might ask the advice of the Ombudsman or seek the office's assistance in bridging communication gaps, thereby averting a formal appeal. If a dispute cannot be resolved informally, the Ombudsman can provide an independent and objective review of the matters in dispute. In some cases, the Ombudsman may conduct his own review of the facts at issue. In cases involving banks operating under formal enforcement actions, the Ombudsman operates in a manner similar to a federal appellate court judge using a "reasonableness" test. In either case, decisions rendered by the Ombudsman are binding on the agency.

In the 13-year life of the Ombudsman's Office, the annual number of inquiries, informal appeals, and formal appeals has ranged from as few as 38, to as many as 200

In the 13-year life of the Ombudsman's Office, the annual number of inquiries, informal appeals, and formal appeals has ranged from as few as 38, to as many as 200. The matters in dispute have been just as varied, ranging from supervisory actions, to communication issues, to violations of law. Community bankers as well as large-bank managers have sought the services of the Ombudsman's Office. The issues at stake may extend beyond an individual bank and may be systemic in nature. No matter how big or small the issue, all contact with the Ombudsman is strictly confidential.

### **Value of the Process**

The appeals process is important for several key reasons. The process contributes to the OCC's goal of maintaining open, continual communications with the institutions the agency supervises. The process also fosters fair and equitable administration of OCC supervisory processes and helps ensure the most sound supervision decisions possible. Lastly, appeals can point out, through lessons learned, areas of the supervisory process that can be improved.

### **Appeals Summaries**

An appeal summary is prepared for each formal appeal received by the Office of the Ombudsman. Without identifying the appealing institution, each summary provides basic facts of the formal appeal, including background, discussion, and conclusions

rendered. Below is a capsule description of each summary for appeals decided in the past two years; the full text of the summaries can be found on the OCC's Web site, by going to [www.occ.gov/appeals.htm](http://www.occ.gov/appeals.htm).

Six of the 11 cases decided in 2006 involved appeals of composite, component, or CAMELS ratings:

- A bank appealed the downgrade of its composite rating from 2 to 3, the management rating of 3 and the execution of a memorandum of understanding. Management contended that its capital exceeded the regulatory minimum, that its principal shareholder had demonstrated the capacity to support the bank, and that the management rating should be 2 based on improving core earnings and the hiring of a new President and Senior Credit Administrator to improve credit administration and overall management of the bank. Additionally, the board stated the bank's condition had not deteriorated from the previous year, but instead had improved dramatically in all key areas supporting a composite rating of 2.

The Ombudsman found that while certain aspects of the bank's operations were improving, overall financial performance was less than satisfactory based on deterioration in credit risk management practices and insufficient earnings to support planned asset growth and capital. The Ombudsman concluded the composite rating of 3 and component ratings assigned at the examination was appropriate.

- In another case, a bank appealed the downgrades of its composite rating to a 3 and its component ratings for asset quality, management, and consumer compliance, as a result of the supervisory office findings that the bank failed to properly oversee its relationship with a third-party subprime mortgage lender. The appeal stated that the report of examination contained erroneous information regarding the bank's relationship with the third-party subprime mortgage vendor, which resulted in unsatisfactory component ratings.

The Ombudsman's review focused on whether the ratings were reasonable as assigned. After reviewing the case file and meeting with the bank's senior management and legal counsel and members of the supervisory office, the Ombudsman upheld the conclusions reached by the supervisory office.

- In a case involving a bank operating under an enforcement action, bank management appealed the composite and component ratings for capital, asset quality, management, earnings, and liquidity assigned by the supervisory office. Management stated that after the examination process was complete, the bank had improved asset quality, policies, and procedures in the lending area, and, therefore the perceived negative impact on capital, earnings, and liquidity did not materialize. The bank management contended that the component and all other ratings except liquidity should have been rated 3 and not 4, and that liquidity should have been rated 2 instead of 3. In this case, the basis of the appeal includes actions taken by management post-examination. The Ombudsman's review focused on whether the ratings were reasonable as assigned at the time of the examination, and the Ombudsman concluded that the decisions reached by the supervisory office were reasonable and well supported.
- A bank appealed the downgrade of its composite rating from 1 to 2, and the component ratings for consumer compliance, asset quality, and management. In reviewing the overall condition of the bank, the Ombudsman noted concerns about the higher risk profile, increased leverage, higher concentrations in the loan portfolio, and the need to strengthen credit risk management practices. Additionally, the bank's low risk-based capital level at the time of the examination and the low allowance for loan and lease losses provided the bank little flexibility to handle unforeseen losses of substance. The Ombudsman upgraded the compliance and management ratings, owing to the existence of a strong compliance management program including an efficient system of internal controls and the demonstrated ability

of the board and management to effectively administer the bank's affairs. However, the overall condition of the bank supported the assigned 2 composite rating.

- A bank appealed the assigned composite 3 rating and asked the Ombudsman to restore the rating to 2. The bank disagreed with the supervisory office's calculation of interest-rate risk (IRR), arguing that the more favorable measure the bank obtained from an outside service to calculate the impact of a shock to agency step-up bonds was valid. The Ombudsman acknowledged that the bank's risk exposure could legitimately be calculated differently by the supervisory office and the company the bank relied upon, but concluded that the bank's risk management processes relative to IRR did not ensure that it could withstand significant fluctuations associated with a portfolio of agency step-up bonds. Additionally, the Ombudsman's review noted a combination of weaknesses in IRR and information technology that reflected a need for enhanced supervision by the board and management. The Ombudsman determined that the conclusions reached by the supervisory office were well supported by the facts at the time of the examination.
- The boards of directors of a group of independently chartered banks collectively appealed to the Ombudsman the composite and component ratings assigned by the supervisory office. The issue involved the question of whether a group of independently chartered banks should be treated as a single complex institution or as a group of separate and independent noncomplex institutions. The Ombudsman concluded that, while the chosen corporate structure comprised individually chartered financial institutions,

An appeal summary is prepared for each formal appeal received by the Office of the Ombudsman

No matter how big  
or small the issue,  
all contact with the  
Ombudsman is strictly  
confidential

discussions showed that one principal person dominated bank management teams. Additionally, the organizational structure provided for centralized decision-making and backroom operations. Furthermore, the Ombudsman found that risk management systems throughout the banks warranted significant improvement in credit administration, nonaccrual accounting, and budget reporting. The Ombudsman concluded that the composite and component ratings as assigned by the supervisory office in the reports of examination were appropriate.

The other appeals heard by the Ombudsman's office involved a variety of issues:

- A bank formally appealed the OCC's right to retain the full semiannual assessment fee for the period of January 1 through June 30, because the bank converted to a state-chartered commercial bank on January 1. Bank management requested a full refund of its semiannual assessment because the supervisory responsibility shifted from the OCC to the state on January 1 and therefore no supervisory activities would be conducted by the OCC during the period covered by the assessment.

The Ombudsman reviewed OCC regulations on the payment of semiannual assessment fees and determined that in accordance with paragraph (5) under section (a) of 12 CFR 8, Assessment of Fees, the OCC assessment is levied against all institutions that are in the national banking system as of December 31 and June 30. Therefore, any bank that is a national bank on the assessment date must pay the full semiannual assessment for the upcoming six-month period. Finding no basis for an exception, the Ombudsman determined that no refund was due the bank.



- A bank appealed a CRA performance rating of “needs to improve,” contending that it was being penalized for its strategy of seeking lending activities outside of its assessment area.

The supervisory office stated the “needs to improve” rating was based on poor lending levels within the bank’s delineated assessment area, citing the bank had the capacity and opportunity to help meet the residential and business credit needs in its assessment area. The bank, however, directed lending activities to a market 60 miles away.

The Ombudsman considered the cumulative factors listed in the CRA performance evaluation, the performance context, and management’s supporting documentation, including acknowledgement of additional lending opportunities within the assessment area, and concluded the “needs to improve” rating was appropriate.

- A bank appealed the supervisory office decision placing a group of loans on nonaccrual status because the loans were secured by real estate. Bank management also appealed the supervisory office directive to re-file its consolidated report of condition and income (call report).

The supervisory office acknowledged the loans were secured by real estate collateral; however, at the time of examination the loans were 90 days past due and not in process of collection as defined by the call report. Additionally, the bank could not support its claims that the loans were well secured and would be repaid in full, because the appraisal was not current and was nonconforming, and the legal action initiated to collect the loans did not ensure timely and full collection.

The Ombudsman concluded the nonaccrual designation assigned by the supervisory office was appropriate, citing that the bank’s initiation of legal action did not ensure full collection of the debt and that there was inadequate support for the claim that the loans were well secured. Further, the directive to re-file the call report was appropriate, since the bank was directed to reverse all accrued and uncollected

interest and other fees and place the loan in nonaccrual status in the same quarter in which the legal process was initiated.

- A bank operating under a formal enforcement action appealed the decision by the OCC's Licensing Department to deny applications to open branches in two communities for the reason that the bank's current operating condition raised significant supervisory concerns. The Ombudsman concluded that the bank's level of progress in addressing supervisory issues and the commitment of bank management and its board to improve operations met the requirements under law for approval of the branch applications. Additionally, he found that the establishment of the branches would positively affect the local communities, while having no material impact on the safe and sound operation of the bank. Therefore, the Ombudsman concluded that the branch applications should be approved.
- The board of directors of a community bank appealed a decision to retain a memorandum of understanding it had entered into in 2002, contending that it had been rated a 2 for three consecutive years, and that the most recent examination showed stronger results in all areas except earnings. After review, the Ombudsman concluded that the MOU had served its purpose and should be terminated.

## PART IV: THE EXAMINATION QUESTIONNAIRE

The Ombudsman's Office distributes the Examination Questionnaire to each national bank at the end of every examination cycle. Using this confidential survey, the office seeks to obtain candid feedback on the OCC's local supervisory office, as well as the OCC as a whole.

Banker feedback helps us to measure how well we do our jobs and to identify areas where we can do better.

### **A Valuable Resource**

National bank officers and directors are valuable sources of information for the OCC in assessing how well the agency is accomplishing its mission. The questions provide bankers an opportunity to share their experiences in working with examiners, attorneys, accountants, and other agency staff members. Bank directors and officers are in the best position to comment on issues such as supervisory effectiveness, regulatory burden, and OCC responsiveness.

Like all other communication with the Ombudsman's Office, responses to the survey are held in the strictest confidence.

### **Questionnaire Contents**

The questionnaire asks institutions to rate the OCC on 22 statements about examinations and the supervisory process in general. Bankers respond on a scale of 1 (completely agree) to 5 (completely disagree). The response rate consistently hovers around 40 percent.

Four narrative questions allow bankers to respond in more detail. Two questions ask about the most and least useful aspects of the OCC supervisory process. The other two ask where examiners need greater knowledge and how supervision needs to change to keep pace with the industry.

## Questionnaire Results

As in past years, the results of questionnaires during calendar years 2005–2006 remain positive. The average rating on the 22 specific statements during the past two years is 1.52. This aggregate rating indicates that respondents generally agree that their local supervisory offices and the OCC as a whole provide effective supervision of their institutions. See Table 1, “Examination Questionnaire Results,” for the combined bankers’ ratings for each statement over the past two years.

The most positive ratings pertained to the professionalism of the examination teams and responsiveness to banks’ needs, signaling that the OCC’s emphasis on professionalism and timely feedback has been well received. Responses were least favorable on eliminating unnecessary regulatory requirements and minimizing the burden of supervision. When bankers provided more expansive responses on this issue in the narrative questions, their responses indicated displeasure with legislative initiatives rather than the OCC’s application of existing regulations.

TABLE 1

## Examination Questionnaire Results—

## Bankers' Ratings of OCC Examinations for January 1, 2005, through December 31, 2006

Ratings are on a scale of 1 (completely agree) to 5 (completely disagree).

Statements	Results		Two-Year Average
	2005	2006	
1. The examination scope was appropriate to accurately assess the bank's condition.	1.43	1.42	1.42
2. The examiners' requests for information before and during the examination were reasonable and justified by the examination scope.	1.37	1.40	1.38
3. The examination team conducted the examination in a professional manner.	1.27	1.23	1.25
4. The examination placed appropriate reliance on the internal audit function and internal risk management functions in the institution to support effective supervision.	1.44	1.42	1.43
5. The examiner-in-charge and the examination team were knowledgeable.	1.33	1.26	1.29
6. The examiner-in-charge and examination team provided useful feedback, observations, and suggestions.	1.39	1.33	1.36
7. The examiner-in-charge and examination team presented well-supported, relevant conclusions regarding the condition of the bank.	1.49	1.42	1.46
8. The recommendations for corrective actions made by the examiner-in-charge and the examination team were reasonable.	1.55	1.51	1.53
9. During the exit and board meetings, the examiner-in-charge and examination team clearly and effectively communicated their findings and concerns.	1.34	1.32	1.33
10. The tone and content of the report of examination were consistent with the exit and board meetings.	1.33	1.32	1.33
11. The report of examination clearly communicated examination findings, significant issues, and the corrective actions (including time frames) management and/or the board needed to take.	1.32	1.28	1.30
12. On-going communication by the examiner-in-charge with senior management and the board of directors was appropriate.	1.30	1.26	1.28
13. Examiners minimized the burden to the degree possible on the bank, its officers, and employees when conducting the examination.	1.46	1.45	1.46
14. The supervisory objectives and strategy incorporated appropriate perspective and provided necessary focus on business risks and the assessment of their significance, and resulted in appropriate development of the examination strategy, emphasis on key risk areas, and resulting areas of focus in the examination.	1.52	1.52	1.52
15. The examination report was delivered in a timely manner, so examination results and corrective actions required by bank management were influenced in a timely and appropriate manner.	1.47	1.44	1.45
16. During the past year or 18 months (i.e., the examination cycle), OCC _____ has/have been responsive to the bank's needs.	1.27	1.25	1.26
a) field staff;			
b) corporate staff (e.g., for corporate applications);	1.35	1.40	1.38
c) attorneys (e.g., for legal opinions);	1.53	1.56	1.55
d) accountants (e.g., for accounting opinions);	1.44	1.46	1.45
e) other _____.	1.00	1.00	1.00
17. The OCC identifies potential problems before they can cause significant harm to the bank.	1.79	1.76	1.78
18. The OCC's supervisory efforts focus on banking activities that pose the highest risk.	1.69	1.68	1.68
19. OCC regulations:	1.82	1.81	1.81
a) effectively target the areas of bank activity that present the greatest risk to safety and soundness, the payments system, or the long-term viability of the national banking system.			
b) promote national banks' competitiveness and allow industry innovation;	2.16	2.10	2.13
c) eliminate unnecessary regulatory requirements and minimize the burden resulting from requirements necessary for effective supervision.	2.51	2.52	2.52
20. The OCC works with the bank and follows up to ensure bank management addresses potential problems and risks.	1.42	1.40	1.41
21. The OCC allows the bank to offer new products and services if the bank has the expertise to manage the risks effectively and to provide the necessary consumer protections.	1.54	1.56	1.55
22. The OCC enforces CRA and fair lending laws by focusing on the bank's performance.	1.60	1.56	1.58
<b>Average</b>	<b>1.53</b>	<b>1.51</b>	<b>1.52</b>
<b>Number of Questionnaires</b>	<b>623</b>	<b>612</b>	<b>1,235</b>

As Figure 7 shows, more than half of the responses indicated that the most useful aspects of OCC supervision are the demeanor and skills of the examiners, and the feedback or answers to questions that bankers received from examiners. Bankers especially appreciated the collaborative—rather than confrontational—approach by examiners.

**FIGURE 7**  
**Most Useful Aspects of OCC Supervision,**  
**2006 Examination Questionnaire Responses**

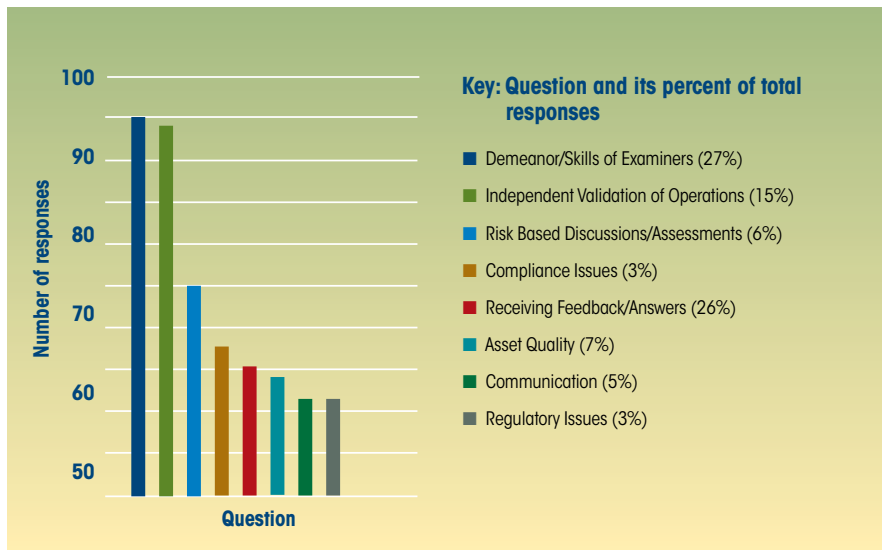
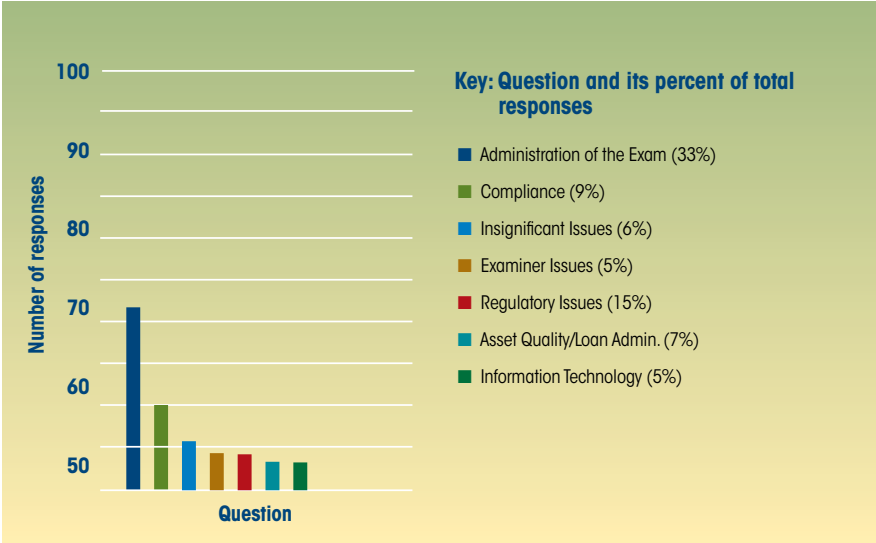


Figure 8 shows about a third of respondents—the largest group—identified the administration of the OCC’s examination as the least useful aspect of agency supervision. Comments typically related to the perceived burden of the examination process. For example, one banker cited the short turnaround time to respond to requests for information. Another banker cited the amount of time required by employees to prepare for the examination. A third cited the OCC’s use of training teams, in which entry-level examiners learn on the job from more seasoned employees, as an additional burden associated with the examination process. The Ombudsman’s Office shares these comments with the supervisory units so that examination teams are sensitive to bankers’ points of view.

**FIGURE 8**  
**Least Useful Aspects of OCC Supervision,**  
**2006 Examination Questionnaire Responses**



When asked to identify areas where OCC examiners need more knowledge, almost half of the respondents—by far the largest number—indicated that they were generally satisfied with examiners’ knowledge, as illustrated in Figure 9. Asset quality and information technology were most often cited as areas for improvement. Our office has shared these findings with bank supervision units so that appropriate levels of expertise are available for examinations.

**FIGURE 9**  
**Areas Examiners Need More Knowledge,**  
**2006 Examination Questionnaire Responses**

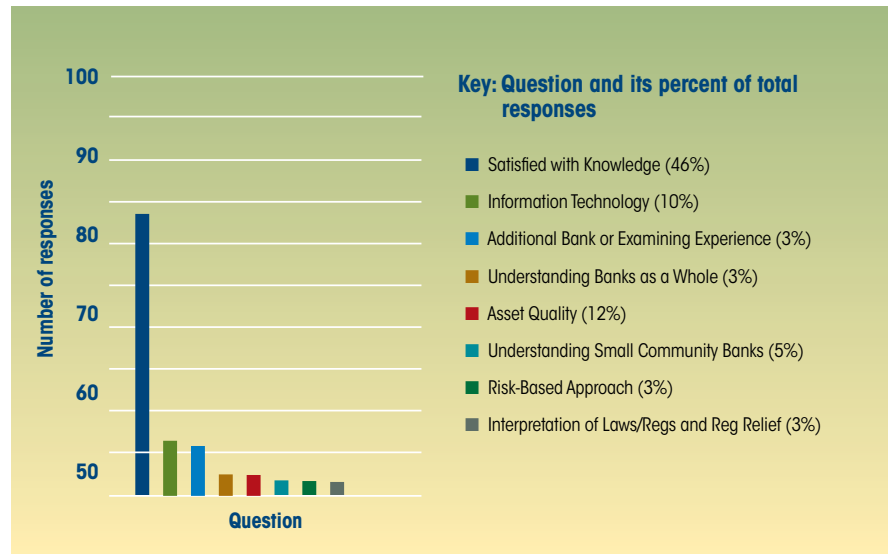
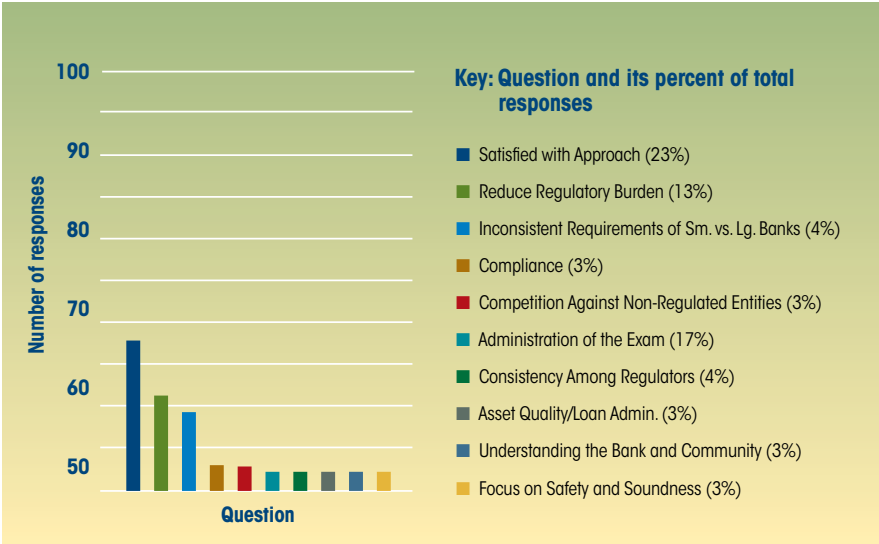




Figure 10 displays the results of the final narrative question about the areas where OCC supervision needs enhancement. The highest number of comments indicated that bankers were satisfied with the OCC’s current approach. Some bankers reiterated their dissatisfaction with the administration of examinations. (See Appendix F for a sample OCC Examination Questionnaire.)

**FIGURE 10**  
**Areas in Need of Enhancement,**  
**2006 Examination Questionnaire Responses**





## Appendix A: How To File a Customer Complaint about a National Bank or a Subsidiary of a National Bank

### *1. Always try first to resolve your issue directly with your bank.*

Because you and your bank are most familiar with your account, the OCC’s CAG encourages you to address the issue directly with your bank. Complaints caused by bank errors or misunderstandings may often be resolved voluntarily by your bank or its subsidiary. Many questions can be answered by receiving the frequently asked questions on [www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov). If you are unable to resolve the issue with your national bank or find the answer online, the Customer Assistance Group stands ready to help and will guide you through the OCC’s complaint process. Our customer assistance specialists are knowledgeable, highly skilled, and customer-focused. They will answer your questions, direct you to the best resources, and get to the bottom of your issue.

You may contact the CAG in several ways, depending on whether you have a general, informal inquiry or you wish to file a formal, written complaint. (An inquiry is a question or comment about a national bank or federal banking laws and regulations. A complaint is a written and signed expression of dissatisfaction about the practices of a national bank.)

### Reaching the OCC’s Customer Assistance Group

#### Informal inquiry

<b>Toll-free telephone:</b>	<b>E-mail:</b>
1 (800) 613-6743 M-F, 7:00 a.m.–7:00 p.m. Central Time	Customer. assistance@occ. treas.gov

#### Formal complaint

<b>Fax:</b>	<b>U.S. mail:</b>
(713) 336-4301	1301 McKinney St. Suite 3450 Houston, TX 77010

## ***2. Call or e-mail CAG with your general inquiries.***

A customer assistance specialist can often answer your general, informal inquiries about banking laws or practices by phone or by e-mail. Because e-mail may not be completely secure, please do not include information in your e-mail that is confidential—such as bank account, credit card, or social security numbers.

The specialist may suggest other ways for you to resolve the problem directly with your bank or its subsidiary. If the case involves disputes that are outside of the CAG's jurisdiction, the specialist may suggest that you consult an attorney for assistance. If a complaint involves a bank or other institution not regulated by the OCC, the CAG will refer you to the appropriate agency.

## ***3. File a written, formal complaint against a national bank.***

If you wish to file a formal complaint against a national bank, the focus of the CAG review is to determine whether the bank's actions are consistent with banking statutes, regulations, or any policies applicable to nationally chartered banking institutions.

Your complaint must be in writing and submitted by U.S. mail or fax. Appendix B is a copy of the OCC Customer Complaint Form. (You may also obtain a copy by calling the toll-free number or by accessing the Internet at [www.occ.gov](http://www.occ.gov) and clicking on "Consumer Complaints and Assistance" on the left side of the home page. This form is also available on the new Web site, [www.HelpWithMyBank.gov](http://www.HelpWithMyBank.gov), under "Need More Help?" on the right side of that home page.) The CAG documents all inquiries and complaints, but can launch a formal investigation only on a complaint submitted in writing and signed by the account holder.

If you do not use the complaint form, your written complaint should contain the following:

1. The full name and address of the national bank or its subsidiary.

2. The consumer's complete name and the consumer's mailing address used by the bank.
3. The consumer's daytime telephone number.
4. The account number of the product in question.
5. A detailed explanation of the complaint or inquiry and a description of how the consumer would like the matter to be resolved.
6. The signature of the account holder, legal guardian, person holding power of attorney, or other person authorized to act for the account holder. If the consumer writing the complaint is not the account holder, you must include documentation indicating your authority, and you must include your contact information.
7. Any documentation supporting the consumer's position.

Once the CAG receives your complete written complaint by U.S. mail or fax, you will be sent an acknowledgment letter showing your assigned case number, and the complaint will be forwarded to the bank for a response. The CAG will send you a final response to your complaint only after reviewing the written reply from the national bank or subsidiary. In reviewing the bank's response, the CAG specialist does not act as an advocate per se, but will evaluate whether your national bank or its subsidiary has taken any action contrary to banking laws and regulations or has committed any unacceptable banking practice. In addition, we look to see if the bank customer was treated fairly. Be assured, a CAG specialist will be there to guide you through the process, from your initial contact with the CAG to the final resolution of your case.

## Appendix B: Customer Complaint Form

OMB Control No. 1557-0232  
Expiration Date: 12/31/2008



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**Comptroller of the Currency  
Administrator of National Banks**

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### CUSTOMER COMPLAINT FORM

Please fill in this form completely, including your signature at the end of the form. If a valid OMB Control Number does not appear on this form, you are not required to complete this form. The Office of the Comptroller of the Currency (OCC) will only act on complaints that are signed by the complainant(s), legal guardian, attorney of complainant(s) along with their client's authorization, or holder of power of attorney.

Include copies of documents related to your complaint such as contracts, monthly statements, receipts and correspondence with the bank.

Mail or fax this completed complaint form with any attachments to:

**Office of the Comptroller of the Currency  
Customer Assistance Group  
1301 McKinney Street, Suite 3450  
Houston, TX 77010-9050  
1-713-336-4301 (Fax)**

In filling out this form, print or type clearly so the information can be easily read and understood.

**Customer Information:**

Mr. <input type="checkbox"/> Ms. <input type="checkbox"/> Mrs. <input type="checkbox"/> Miss <input type="checkbox"/>				
Name:				
First		Middle		Last
Address:				
Street		City	State	Zip
Daytime Phone:	( )	Fax:	( )	
Email:				

## Appendix B: Customer Complaint Form *(continued)*

### CUSTOMER COMPLAINT FORM (Page 2)

#### Bank Information (National Bank or its operating subsidiary you are filing a complaint against)

Name of Bank:				
Address:				
	Street	City	State	Zip
Type of Account:		Account #:		
Have you tried to resolve your complaint with the bank?			<input type="radio"/> Yes	<input type="radio"/> No
If Yes, when?		How?	<input type="radio"/> Phone	<input type="radio"/> Mail
			<input type="radio"/> In Person	<input type="radio"/> Other

If you have an attorney or other representative you want us to deal with directly, please provide your representative's information below. Your signature on this form authorizes your bank and our office to release information to your representative.

Name of Representative:				
Title:				
Address:				
	Street	City	State	Zip
Daytime Phone:	( )	Fax:	( )	

Please print or type your complaint. Describe events in the order in which they occurred, including any names, phone numbers, and a full description of the problem with the amount(s) and date(s) of any transaction(s). You should also include any response from the bank. Be as brief and complete as possible to make the explanation clear. Use separate sheet(s) of 8.5" x 11" paper if you need more space.

## Appendix B: Customer Complaint Form *(continued)*

### CUSTOMER COMPLAINT FORM (Page 3)

State your desired resolution:

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### PRIVACY ACT STATEMENT

The solicitation and collection of this information is authorized by 15 U.S.C. § 57a(f) and 12 U.S.C. 1 et seq. The information is solicited to provide the Office of the Comptroller of the Currency (OCC) with data that is necessary and useful in reviewing requests received from individuals for assistance in their interactions with national banks. The provision of requested information is voluntary. However, without such information, the ability to complete a review or to provide requested assistance may be hindered.

It is intended that the information obtained through this solicitation will be used within the OCC and provided to the national bank that is the subject of the complaint or inquiry. Additional disclosures of such information may be made to: (1) other third parties when required or authorized by statute or when necessary in order to obtain additional information relating to the complaint or inquiry; (2) other governmental, self-regulatory, or professional organizations having: (a) jurisdiction over the subject matter of the complaint or inquiry; (b) jurisdiction over the entity that is the subject of the complaint or inquiry; or (c) whenever such information is relevant to a known or suspected violation of law or licensing standard for which another organization has jurisdiction; (3) the Department of Justice, a court, an adjudicative body, a party in litigation, or a witness when relevant and necessary to a legal or administrative proceeding; (4) a Congressional office when the information is relevant to an inquiry initiated on behalf of its provider; (5) Other governmental or tribal organizations with which an individual has communicated regarding a complaint or inquiry about an OCC-regulated entity; (6) OCC contractors or agents when access to such information is necessary; and (7) other third parties when required or authorized by statute.

I certify that the information provided on, or with, this form is true and correct to the best of my knowledge.

<b>Signature:</b>		<b>Date:</b>	
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We will mail you a written acknowledgment within five (5) business days of receipt of your completed complaint form. If you have any questions regarding this case, please call 1-800-613-6743.



## **Appendix C: How To File an Appeal**

Any national bank may file a formal or informal appeal of an OCC action or decision with its OCC supervisory office or with the Ombudsman. If you file an appeal, formal or informal, with your supervisory office and disagree with its decision, you may appeal that decision to the Ombudsman.

Initiating an informal appeal is as simple as making a telephone call. Be sure to have at hand all of the relevant facts surrounding the matter.

For formal appeals, submit information in writing fully describing the issues in dispute. The appeal must have the approval of the bank's board of directors. A written response to your appeal will usually be issued within 45 calendar days of its acceptance, unless special circumstances exist.

The Ombudsman has authority, with consent of the Comptroller, to stay any appealable agency decision or action while he considers the facts of the appeal. For information on what is appealable and what is not, see Appendix D, "Frequently Asked Questions about the National Bank Appeals Process."

For more information about the national bank appeals process, or to discuss an agency action or decision, please contact the Ombudsman at:

**OFFICE OF THE OMBUDSMAN**  
1301 McKinney Street, Suite 3400  
Houston, TX 77010-3034  
Telephone: (713) 336-4350  
Fax: (713) 336-4351

## **Appendix D: Frequently Asked Questions about the National Bank Appeals Process**

Below are some frequently asked questions regarding OCC Bulletin 2002-9, “National Bank Appeals Process—Guidance for Bankers.” The full text of the bulletin can be found on the Web at [www.occ.gov/ftp/bulletin/2002-9.pdf](http://www.occ.gov/ftp/bulletin/2002-9.pdf).

### ***Where can I find the OCC’s policy guidance on the National Bank Appeals Process?***

OCC Bulletin 2002-9, “National Bank Appeals Process: Guidance for Bankers” (February 25, 2002), contains the OCC’s procedures for national banks to appeal agency decisions and actions. It defines the types of decisions that can be appealed to the Ombudsman or the bank’s immediate OCC supervisory office.

### ***What are the major provisions of OCC Bulletin 2002-9?***

*Major appealable and non-appealable matters.* Bulletin 2002-9 clarifies the types of decisions that can be appealed to the Ombudsman or the bank’s immediate supervisory office. Banks can appeal decisions such as informal enforcement actions, examination ratings, the adequacy of loan loss reserves, and classifications of significant loans.

According to the bulletin, banks cannot ask the Ombudsman to review agency decisions when statute or OCC regulation offers another method of appeal, or when the decision is subject to judicial review. Banks cannot appeal agency decisions to pursue formal enforcement action, recommended decisions following formal or informal adjudications pursuant to the Administrative Procedures Act, 5 USC 701 et seq., agency actions that are subject to judicial review, and decisions made to disapprove directors and senior executive officers pursuant to Section 914 of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, 12 USC 1831i.

*Formal enforcement-related action or decision defined.* In clarifying non-appealable “formal enforcement-related actions or decisions,” the bulletin includes as non-appealable the OCC’s statement of the facts that underlie recommended or pending formal enforcement actions, the OCC’s description of a bank’s acts or practices that are the subject of these actions, and the OCC’s determinations regarding a bank’s compliance with an existing formal enforcement action.

***When is a formal enforcement-related action or decision considered to have commenced?***

A formal enforcement-related action or decision commences when the OCC’s Supervision Review Committee determines that the OCC will pursue a formal action under applicable statutes, regulations, or published OCC enforcement-related policies.

***Is anything appealable once a formal enforcement action has taken place?***

Yes. Bulletin 2002-9 does permit material supervisory determinations to be appealed even after an enforcement action has been taken. For example, a bank that is being placed under formal enforcement action can appeal its CAMELSI<sup>1</sup> ratings (composite or individual components), loan classifications, or conclusions rendered on the adequacy of its allowance for loan and lease losses. In such cases, the Ombudsman would restrict his review to the factual record, primarily to the facts detailed in the Report of Examination. His decision would rest on whether the Uniform Financial Institution Rating System criteria or other relevant policies have been applied correctly and consistently by the supervisory office. Essentially, the Ombudsman would use a process similar to that of a federal appellate court judge rather than the de-novo review process that is customarily employed on non-enforcement-related appellate matters.

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<sup>1</sup> “CAMELSI” stands for capital, asset quality, management, earnings, liquidity, sensitivity to market risk, and information technology. Using Uniform Financial institutions Rating System criteria, OCC examiners give a bank individual ratings for each of these areas and a composite rating for these areas collectively.

***Can you tell me all of the types of OCC decisions that are not appealable?***

In accordance with 12 USC 4806, Bulletin 2002-9 provides that the following agency actions or decisions are not appealable to the Ombudsman or the bank's immediate supervisory office:

1. Appointments of receivers and conservators;
2. Preliminary examination conclusions communicated to the national bank before a final report of examination or other written communication from the OCC is issued;
3. Any formal enforcement-related actions or decisions, including decisions to:
  - (a) seek the issuance of a formal agreement or cease and desist order, or the assessment of a civil money penalty pursuant to Section 8 of the Federal Deposit Insurance Act (FDIA);
  - (b) take prompt corrective action pursuant to Section 38 of the 12 USC 1831o);
  - (c) issue a safety and soundness order pursuant to Section 39 of the FDIA (12 USC 1831p-1); and
  - (d) commence formal investigations pursuant to 12 USC 481, 1818(n) and 1820(c);
4. Formal and informal rulemakings pursuant to the Administrative Procedure Act (APA), 5 USC 500 et seq.;
5. Decisions or recommended decisions following formal and informal adjudications conducted pursuant to the APA, 5 USC 701 et seq.;
6. Requests for agency records or information under, and submission of information to the OCC that is governed by, the Freedom of Information Act, 5 USC 552, or 12 CFR 4;

7. Decisions made to disapprove directors and senior executive officers pursuant to Section 914 of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989 (FIRREA) (12 USC 1831i); and
8. Any other agency decisions that are subject to judicial review.

***Does the bank's board of directors have to approve the appeal?***

Yes. The board must approve the appeal and the bank's President or Chief Executive Officer must confirm in the submission to the OCC that the board has done so.

***If a bank files an appeal, must it still comply with the OCC supervisory action being appealed?***

As a general matter, material supervisory determinations and actions are not stayed during the pursuit of an appeal. However, upon written request from the bank, the Ombudsman or an appropriate OCC official may relieve the bank of its obligation to comply with the supervisory decision or action while the appeal is pending.

## Appendix E: Examination Questionnaire Form

### Comptroller of the Currency Examination Questionnaire

This form is being used to help measure the effectiveness of the overall supervision of your institution, including the examination that was just completed. Your input will help us evaluate the OCC's performance and progress in improving the efficiency and effectiveness of our bank supervision efforts. Please complete the attached questionnaire and return it to Samuel Golden, Ombudsman, the administrator of the program. Your response is **entirely voluntary** and will remain **confidential**. If you would like to discuss this questionnaire, please feel free to contact Samuel Golden at (713) 336-4350.

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#### 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 a national bank 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 bank examinations. The OCC Ombudsman will use the information received to evaluate the effectiveness of the examination process and agency communications. The OCC Ombudsman promotes OCC/banker communications and resolves problems and conflicts.

The OCC expects to collect this information from approximately 2,600 national banks. Each respondent is estimated to file 1.5 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 bank management has no descriptive comments, and could take 30 minutes or more in those instances where bank management has substantial descriptive comments. The burden for this collection is estimated at 650 burden hours per year.

# Appendix E: Examination Questionnaire Form (continued)

OMB Control #1557-0199  
Exp: 08-31-2004

## Comptroller of the Currency Examination Questionnaire

### Large Banks

To be filled out by the Assigned Examiner:

**Type of Supervisory Activity:**

- Commercial    Consumer Compliance    CRA    Fair Lending    Information Technology (IT)  
 Fiduciary    Other (specify) \_\_\_\_\_

**Date of Supervisory Activities:** \_\_\_\_\_

To be filled out by bank management:

Name and Position: \_\_\_\_\_

Bank Name: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

### Regarding the examination just completed:

	Completely Agree	2	Somewhat Agree	4	Completely Disagree
	1	2	3	4	5
1. The examination scope was appropriate to accurately assess the bank's/company's condition.	1	2	3	4	5
2. The examiners' requests for information before and during the activities were reasonable and justified by the examination scope.	1	2	3	4	5
3. The examination team conducted their activities in a professional manner.	1	2	3	4	5
4. The examination placed appropriate reliance on the internal audit function and internal risk management functions in the institution to support effective supervision.	1	2	3	4	5
5. The examiner-in-charge and examination team were knowledgeable.	1	2	3	4	5
6. The examiner-in-charge and examination team provided useful feedback, observations and suggestions.	1	2	3	4	5
7. The examiner-in-charge and examination team presented well-supported, relevant conclusions regarding the condition of the bank.	1	2	3	4	5
8. The recommendations for corrective actions made by the examiner-in-charge and the examination team were reasonable.	1	2	3	4	5
9. During exit and board meetings, the examiner-in-charge and examination team clearly and effectively communicated their findings and concerns.	1	2	3	4	5

## Appendix E: Examination Questionnaire Form (continued)

OMB Control #1557-0199  
Exp: 08-31-2004

	Completely Agree		Somewhat Agree		Completely Disagree
	1	2	3	4	5
10. The tone and the content of the report of examination were consistent with the exit and board meetings.	1	2	3	4	5
11. The report of examination clearly communicated examination findings, significant issues and the corrective actions (including timeframes) management and/or the board needed to take.	1	2	3	4	5
12. On-going communication by the examiner-in-charge with senior management and the board of directors was appropriate.	1	2	3	4	5
13. Examiners minimized the burden to the degree possible on the bank, its officers and employees when conducting the examination.	1	2	3	4	5
14. The supervisory objectives and strategy incorporated appropriate perspective and provided necessary focus on business risks, assessment of their significance, and resulted in appropriate development of the examination strategy, emphasis on key risk areas and resulting areas of focus in the examination.	1	2	3	4	5
15. The examination report was delivered in a timely manner, so examination results and corrective actions required by bank management were influenced in a timely and appropriate manner.	1	2	3	4	5

### Regarding the OCC's overall supervision of your institution:

16. During the past year or 18 months (ie., the examination cycle), OCC _____ has/have been responsive to the bank's needs:					
a) field staff;	1	2	3	4	5
b) corporate staff (e.g., for corporate applications);	1	2	3	4	5
c) attorneys (e.g., for legal opinions);	1	2	3	4	5
d) accountants (e.g., for accounting opinions);	1	2	3	4	5
e) other _____	1	2	3	4	5
(Please do not respond to b, c, d, or e if you have not dealt with OCC's corporate staff, attorneys, accountants, etc.)					
17. The OCC identifies potential problems before they can cause significant harm to the bank.	1	2	3	4	5
18. The OCC's supervisory efforts focus on banking activities that pose the highest risk	1	2	3	4	5
19. OCC regulations:					
a) effectively target the areas of bank activity that present the greatest risk to safety and soundness, the payments system, or the long-term viability of the national banking system;	1	2	3	4	5
b) promote national banks' competitiveness and allow industry innovation;	1	2	3	4	5



## Appendix E: Examination Questionnaire Form *(continued)*

OMB Control #1557-0199  
Exp: 08-31-2004

	Completely Agree		Somewhat Agree		Completely Disagree
	1	2	3	4	5
c) eliminate unnecessary regulatory requirements and minimize the burden resulting from requirements necessary for effective supervision.	1	2	3	4	5
20. The OCC works with the bank and follows-up to ensure bank management addresses potential problems and risks.	1	2	3	4	5
21. The OCC allows the bank to offer new products and services if the bank has the expertise to manage the risks effectively and to provide the necessary consumer protections.	1	2	3	4	5
22. The OCC enforces CRA and fair lending laws by focusing on the bank's performance.	1	2	3	4	5

**Please use the space below to add any descriptive comments or add additional pages, if needed.**

What are the most useful aspects of the OCC's supervision, including the examination just completed?

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What are the least useful aspects of the OCC's supervision, including the examination just completed?

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Please indicate any areas where you think OCC examiners need greater knowledge to understand your bank's lines of business and their inherent risks.

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Please address any areas where you think the OCC's fundamental supervision approach and/or methods of supervision need to change to evolve to keep pace with the industry.

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**Please return this form to: Samuel Golden, Ombudsman, 1301 McKinney Street, Suite 3725, Houston TX 77010. Phone (713) 336-4350 Fax: (713) 336-4351.**

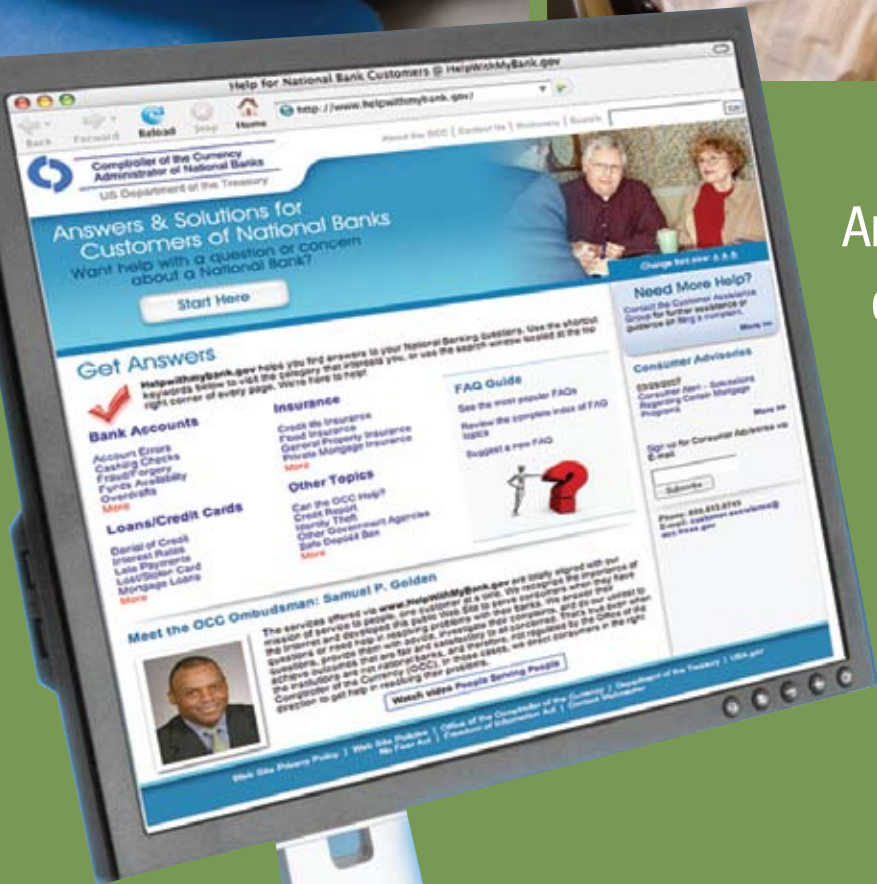


## The core values underlying the office's mission:

- Maintaining a professional staff
- Fostering an environment that disadvantages no one and embraces a sense of fairness
- Ensuring independence with no retribution
- Promoting convenience and accessibility for constituents
- Applying the effective use of technology
- Sustaining processes that are integrated with, and contribute to, the agency's regulatory responsibility
- Preserving confidentiality



*People serving people, one customer at a time*



Answers for customers  
of national banks at  
**HelpWithMyBank.gov**