



EP-EPC

Comptroller of the Currency
Administrator of National Banks

Examination Planning and Control

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Examination Planning and Control

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Background

The OCC fulfills its mission to promote and ensure the safety and soundness of the national banking system principally through its program of continual examination. Examining comprises more than just the on-site activities that result in an examination report. It includes discovery of a bank's condition, ensuring that the bank corrects significant deficiencies, and continually monitoring the bank's activities. In large banks, examination activity can occur for much of the 12-month supervisory cycle. In smaller national bank affiliates and community banks, most examination activities take place during one interval of the 12- or 18-month supervisory cycle, although these banks are also monitored throughout the supervisory cycle. Regardless of the size or complexity of the bank, all OCC examination activities are carefully planned, effectively managed, and judiciously reviewed.

This booklet provides guidance and procedures on planning and controlling all types of examination activities, including safety and soundness, consumer compliance, Community Reinvestment Act (CRA), fiduciary, and bank information systems. For practical purposes, however, this booklet primarily addresses planning and controlling the specific on-site examination activities. For further guidance, examiners should also refer to the "Bank Supervision Process" and "Large Bank Supervision" booklets. To assist in both planning and controlling an examination, examiners should use various OCC information systems to gather and maintain data. These systems include the risk assessment system (RAS), Supervisory Monitoring System (SMS), the Report of Examination program (ROE program), internal OCC Lotus models (e.g., Qcalc), the Uniform Bank Performance Report (UBPR) and the National Bank Surveillance and Video Display System (NBSVDS).

Planning also identifies and establishes supervisory goals and objectives for incorporation into a bank's updated supervisory strategy. Examination planning implements supervisory goals and objectives that are established in the bank's current approved supervisory strategy. The examiner's planning activities also include ensuring that OCC resources are efficiently used, establishing appropriate examination procedures, and developing guidelines for OCC personnel to follow when completing assignments.

When managing an examination, examiners must ensure that the objectives of the supervisory strategy are met and that the activity is completed in a timely manner. The examiner-in-charge (EIC) must monitor the progress of the

examination continually and supervise, coordinate, and evaluate the work of assisting examiners. The EIC also must communicate effectively with bank management, the OCC supervisory office, and the examination team.

After the examination activity is complete, examiners must:

- Verify the accuracy and completeness of the report of examination and appropriate supervisory information (SMS, etc.), as applicable.
- Ensure that summary communications with the board and management of the bank are properly documented.
- Determine that working papers document examination findings and provide an adequate audit trail.
- Update appropriate supervisory strategies to reflect ongoing supervision activities for the next examination cycle.

Interagency Coordination

Section 305 of the Riegle Community Development and Regulatory Improvement Act of 1994 (CDRI), which amended the Federal Deposit Insurance Act of 1991 (FDICIA), 12 USC 1820(d), requires each federal banking agency, to the extent practical and consistent with principles of safety and soundness:

- To coordinate examinations to be conducted by the agency at an insured depository institution and its affiliates.
- To coordinate such examinations with the other appropriate federal banking agencies.
- To work to coordinate examinations with appropriate state bank supervisors.
- To use copies of reports of examination made by any other federal banking agency or appropriate state bank supervisor to eliminate duplicative requests for information.

A federal banking agency can, however, conduct a separate examination in an emergency or under other pressing circumstances, or when the agency believes that a violation of law may have occurred.

The agencies are currently working on a system to uniformly implement section 305. Until that system is developed and approved, the federal banking agencies are operating under the policy statement detailed below.

The federal banking agencies issued an “Interagency Policy Statement on Examination Coordination and Implementation Guidelines” on June 10, 1993. The policy statement and its accompanying guidelines outline a program of coordinated examinations that is intended to minimize disruptions and burdens associated with the examination process. The interagency statement is designed to:

- Eliminate duplication in examinations by multiple agencies.
- Increase coordination of examinations among agencies when duplication is necessary.
- Establish procedures to centralize and streamline examinations in multibank organizations.

The OCC office that has supervisory authority for the lead national bank of a multibank holding company, the national bank affiliates of a multibank holding company with a lead state bank, or the lead national bank in a chain banking group is responsible for coordinating the examinations of affiliated national banks in the organization with other regulatory agencies and OCC supervisory offices, as applicable. The OCC shares supervision on issues related to shared national credits, the results of Interagency Country Exposure Review Committee (ICERC) decisions, and multiregional data processing services. When supervisory responsibility for an institution is shared with other regulatory agencies, the EIC should follow the established interagency guidelines. (Refer to appendix A of this booklet for the complete policy statement and its guidelines.)

Examination Planning

Scheduling Examinations

Examiners perform ongoing supervision and periodic follow-up activities during an examination cycle to identify and assess risks and changing conditions. Refer to the “Bank Supervision Process” booklet of the Comptroller’s Handbook for more details on examination cycles and scheduling.

Safety and Soundness Examinations

A bank's statutory examination cycle is governed by FDICIA, as amended by section 306 of the CDRI and 12 CFR 4.6. Under these statutes, a full-scope, on-site safety and soundness examination must be completed at each bank during a 12-month period, unless the bank is eligible to be examined on an 18-month cycle. This requirement extends to insured trust companies and bank subsidiaries of multibank holding companies. The examination cycle begins at the end (i.e., the close date) of the previous full-scope, on-site safety and soundness examination and ends with the beginning (i.e., the start date) of the next full-scope, on-site safety and soundness examination. The cycle covers all planned supervisory activities that commence during this time frame. Extending the examination schedule to an 18-month cycle is permissible if a bank meets all of the following criteria:

- Total assets were less than \$250 million at the previous examination close date.
- The national bank is considered well capitalized in accordance with FDICIA section 131, "Prompt Corrective Action" (12 USC 1831o; 12 CFR 6).
- The national bank is well managed.
- The national bank's condition is outstanding or good (composite Uniform Financial Institutions Rating System [UFIRS] rating of 1 or 2).
- The national bank is not subject to any formal enforcement action.
- No person acquired control of the institution during the 12-month period in which a full-scope, on-site examination would be required.

The statutory examination cycle for a bank is normally completed when examiners perform enough procedures to allow them to confirm or change a bank's composite rating and component ratings as defined in the interagency UFIRS and conclude on the risk profile for the bank. These activities are normally performed as part of the on-site examination for community banks. The requirements are fulfilled for a large bank through the completion of various examination activities throughout the examination cycle.

Specialty Area Examinations

The OCC conducts specialized examinations for areas not directly related to fulfilling statutory requirements for safety and soundness examinations. The scope of each specialty area examination must be sufficient to confirm or

change the applicable composite and component ratings for the particular specialty area. The scope should be adjusted according to the level of risk assumed by the bank. The frequency of these examinations is generally not set by statute. CRA examinations must be sufficient to render a public evaluation. As noted below, the OCC has established separate examination cycles for each specialty area.

Consumer Compliance

Consumer compliance examinations encompass all consumer compliance areas, including the Bank Secrecy Act, CRA, and fair lending. In large banks, consumer compliance examinations are conducted on a two-year cycle. Community bank consumer compliance examinations occur every 24 or 36 months, based on the safety and soundness examination cycle of 12 or 18 months, respectively, as described above. During interim examinations for both large and community banks, examiners must at least follow up on concerns noted at the previous compliance examination. More frequent examinations of CRA may be required if the CRA rating is more than 24 months old and a formal protest from the public is received regarding a corporate application. (Refer to PPM 5200-1 for details.)

Bank Information Systems Examinations

A bank information systems (BIS) examination must be conducted at the same frequency as the full-scope, on-site safety and soundness examination (i.e., once in each 12- or 18-month cycle). BIS examinations are normally conducted concurrently with the safety and soundness examination.

Independent data centers under the Multiregional Data Processing Services (MDPS) program will be examined on a 12-, 18-, or 24-month cycle based on ratings. In addition, interim reviews at a minimum of every 12 months are required.

The OCC has determined that non-MDPS centers (e.g., independent servicers, bank service corporations, and holding company departments or subsidiaries) will be examined every 12 months. The scope of the activity must be sufficient to verify the BIS ratings. (Refer to PPM 5300-1, Examining Circular 261, and OCC Bulletin 95-5 for additional details.)

Federal Branch and Agency Examinations

FDICIA requires an annual on-site examination of federal branches and agencies. The examination scope must be sufficient to judge the accuracy of applicable composite and component ratings outlined in the Interagency

Supervisory Rating System for U.S. Branches and Agencies of Foreign Banks.
(Refer to PPM 5130-1(REV) for additional details.)

Fiduciary Examinations

- Fiduciary examinations of bank trust departments are conducted at least every 24 or 36 months, based on the safety and soundness examination cycle of 12 or 18 months, respectively.
- Insured trust companies are covered by FDICIA. Therefore, a safety and soundness examination must be performed on a 12- or 18-month cycle depending upon the size of the commercial assets and other considerations. In addition, a fiduciary examination is also required and must be conducted at least every 24 or 36 months, as determined by the safety and soundness cycle.
- Fiduciary examinations of uninsured trust companies must occur on a 24- or 36-month cycle determined by the size of fiduciary assets. Uninsured trust companies with fiduciary assets of more than \$1 billion must receive a fiduciary examination at least every 24 months. Uninsured trust companies with fiduciary assets of less than \$1 billion must receive a fiduciary examination at least every 36 months.

Municipal Securities and Government Securities Dealers Examinations

The OCC is required by statute (Securities and Exchange Act, 17 USC 240.15B(c)(7)) to examine a national bank that has registered with the OCC as a municipal securities dealer. While the statute does not define the full scope of the review, it does require that the OCC examine for compliance with Municipal Securities Rulemaking Board standards. This examination is required to occur once every 24 months. All other activities of the dealer are examined according to the safety and soundness standards set by FDICIA.

There is no similar statute for government securities dealers. In most cases, a government securities dealer is also a municipal securities dealer. It is OCC policy to examine government securities dealers on the same basis as municipal securities dealers, both in scope and frequency. Compliance is examined every 24 months and other activities are examined every 12 or 18 months per FDICIA.

Pre-Examination Planning

The OCC's bank supervision policies require that a specific supervisory strategy be developed for each national bank detailing planned activities. For community banks, planning normally begins at the conclusion of a full-scope,

on-site examination activity. Planning for large banks is ongoing. Since a supervisory strategy is dynamic, examiners should review the strategy quarterly and revise or update it based on the risk profile of the bank, developments in the financial services industry, and as changes in OCC or regulatory initiatives warrant. Examiners should discuss formulation of or significant modifications to supervisory strategies with bank management.

For community banks with low-to-moderate and stable risk, the EIC will follow the standardized procedures described in the “Community Bank Examination Procedures for Noncomplex Banks” booklet of the Comptroller’s Handbook. For community banks with higher risk or for large banks, the EIC may develop more specialized procedures for the examination. In either case, the procedures must provide a clear, step-by-step method of achieving the stated supervisory strategy objectives.

If the supervisory activity will include a review of specialty areas of bank operations, the examiner must incorporate consumer compliance (including CRA, fiduciary, and BIS) objectives in the scope. For community bank compliance examinations, the procedures in the “Community Bank Consumer Compliance” booklet should be followed. The EIC and the appropriate supervisory office should work together to coordinate the availability of OCC resources for the scheduled examination.

For a CRA examination, the EIC or the OCC’s appropriate community reinvestment and development specialist will contact a sample of locally based customer, community, small business, and government groups. The purpose of identifying such contacts is to give these groups an opportunity to provide input into the CRA examination. The OCC will publish, at least 30 days before the beginning of each calendar quarter, a list of the CRA examinations scheduled for the upcoming quarter.

To achieve a consistent and effective planning process, examiners must:

- Review the supervisory strategy and other OCC management information systems – e.g., RAS, SMS, Customer Activity Tracking System (CATS), Consumer Complaint Information System (CCIS).
- Discuss the bank and its risks with the portfolio manager.
- Perform pre-examination analysis.
- Coordinate interagency plans, if necessary.
- Contact bank management.

- Send a request letter.
- Modify the supervisory strategy, if necessary.
- Determine staffing assignments.
- Prepare a scope memo.
- Communicate with staff through a scope memo, electronic messaging, and/or a meeting.

The EIC, or designee, will contact the appropriate bank management official to outline the scope and objectives of examination activities; provide information about examiners' schedules, staffing levels, and estimated time in which examiners will be on-site; gather information on significant changes in bank personnel, products, services, local economy, and the availability of key personnel; and, identify bank needs and areas the bank wants the OCC to consider for review. This contact should take place after the pre-examination analysis, and generally should be made four to six weeks before the start of the examination. During the discussion with management, the examiner should convey the reasoning behind the scope and objectives of the examination or activity, including conclusions from the OCC's risk assessment system. The examiner should review the risk assessment with bank management. The examiner also should state whether any changes in the scope or objectives are necessary as a result of this discussion.

Soon after the bank is contacted and at least three weeks before an examination activity is scheduled to begin, the EIC will send a request letter to the bank. The request letter should inform the bank of the date on which the examination is to begin, describe the scope and objectives of the examination, and request material from the bank to help evaluate the bank's condition. A three-week advance notice provides flexibility in scheduling and adjusting supervisory strategies and also gives bank management time to prepare the information requested.

Request letters should be tailored to reflect information needed to meet examination objectives. A standard safety and soundness request letter for community banks is provided in the "Community Bank Examination Procedures for Noncomplex Banks" booklet. A standard consumer compliance request letter for community banks is provided in the "Community Bank Consumer Compliance" booklet. There currently are no standard request letters for fiduciary or BIS examination activities. Any additions to the standard request letters for an examination of a community bank with low-to-moderate, stable risk require the approval of the appropriate supervisory office. For community banks with higher risks or for large banks, the standard

community bank request letters can be customized or expanded based on approved supervisory strategies and consultations with the appropriate supervisory office. Where possible, examiners should use existing bank-generated reports and records. Special reports or copies of bank records or documents should be requested only when necessary. Any questionnaires used should be clearly valuable to the examination and should be balanced with other methods of obtaining information (e.g., discussions with bank management). Questionnaires also should be tailored to reflect examination objectives.

Examination Management

Responsibilities of the EIC

To manage an examination effectively, the EIC must provide an organized environment in which supervisory goals and objectives can be achieved within appropriate time frames. The EIC also must ensure that examination controls and procedures provide an orderly way in which to administer and record examination activities.

The EIC must communicate the following information to examining staff:

- The scope and objectives of the examination.
- Assignments, due dates, and work product standards.
- Performance expectations and evaluation responsibilities.
- Guidelines for examiner contact with bank management and staff.
- Other administrative details.

An EIC can communicate with examining staff by distributing a scope memorandum, sending electronic messages, or holding a staff meeting. This communication should take place, whenever possible, before the examining team's arrival at the bank. If necessary, an examiner staff meeting can be held at the bank at the beginning of the examination to confirm the information previously communicated.

When examining larger banks, the EIC will, at a minimum, meet with supervising examiners in charge of specific bank departments or functional areas. Functional EICs subsequently will meet with their respective staffs to convey examination guidelines.

During the examination, examining staff must inform the EIC of preliminary conclusions and the EIC must evaluate progress toward completing the supervisory objectives. In some cases, conclusions based on preliminary findings may be sufficient to satisfy examination objectives, thereby allowing resources to be reallocated to other tasks. In other cases, identified issues may require expanding the scope of the examination.

The EIC will meet with the bank's chief executive officer (CEO), appropriate members of senior management, or board members at the beginning of an examination:

- To explain the scope and objectives of the examination.
- To discuss guidelines for conducting the examination and explain the role of assigned examiners.
- To establish guidelines for examiner communication with bank management and staff.
- To answer management's questions.

Periodic meetings with bank management are essential during the examination. Discussion of key issues and preliminary findings prevents misunderstanding and allows bank management to provide additional information. Every effort must be made to resolve significant differences concerning material findings, conclusions, or recommendations. The purpose of ongoing communication and discussion ensures that examiners derive conclusions from sound and accurate information. When differences remain, examiners must ensure that they understand the reason for the disagreement and describe this reason in communications with OCC and bank management.

The EIC will communicate, as necessary, with the appropriate OCC supervisory office regarding examination progress. The EIC should discuss preliminary conclusions, significant violations, potential problem bank situations, possible civil money penalty (CMP) referrals, and any other significant issues. Contact with a district's legal staff, subject matter experts, or specialty examiners (consumer/CRA, fiduciary, BIS) may be appropriate for unusual situations, significant violations, proposed enforcement actions, or other significant supervisory matters.

The EIC usually will be present throughout the examination. At community banks, supervisory office management, or designees, will visit or call during on-site examinations. At large banks, the supervisory office management or someone from Large Banks may visit or call.

The EIC or assigned examiners are responsible for completing assignment evaluations. They must, therefore, monitor the performance of OCC employees participating in the examination in order to evaluate their skills.

As representatives of the OCC, the conduct of examiners during an examination must be professional. All members of the examining team will:

- Ensure the confidentiality of records.
- Conduct meetings and gather information efficiently to minimize disruption of the bank's operations.
- Adhere to schedules for meetings and appointments, including providing updates to bank management during the examination.
- Discuss needs for timely information.
- Give bankers the opportunity to explain the reasons for their actions.
- Be respectful of the opinions of bankers and locally based groups.
- Handle any conflicts in a tactful and professional manner.

Working Paper Documentation

Working papers must support examination findings and be prepared in accordance with PPM 5400-8. The EIC, or other assigned examiners, usually will review working papers soon after completion of assignments and before the examiners are released from the examination. The extent of working paper review should reflect the nature of the work, its relative importance to the overall objectives of the examination, and the experience of the examiner performing the work.

Control Systems

Control systems help keep the examination well organized and focused on key objectives. They can be used to track assignments, schedules, budgeted workdays, work-flow progress, interim findings, or for other administrative functions. The systems may vary depending on the type of bank being examined: simple record keeping systems may be all that is needed at small community banks, while regional and multinational examinations generally require detailed tracking systems.

Exit Meetings

The EIC will have an exit meeting with appropriate bank management officials when the examination is completed. The examiners will present examination findings, conclusions regarding condition and risk, and any matters requiring board attention. During the meeting, the EIC will rank issues identified in the examination by order of importance to help management understand which areas present the most risk to the bank. The exit meeting also provides an opportunity for bank management to respond to OCC concerns, clarify issues, and ask questions.

Examiners should also discuss conclusions about risk with appropriate bank management during exit meetings. While the OCC does not require bankers to adopt a similar process, examiners must communicate effectively the rationale for their risk evaluation decisions to ensure effective supervision. These discussions will help the OCC and company or bank management come to a common understanding of the risks facing the bank, the strengths and weaknesses of the company's or bank's risk management system, and OCC's future supervisory plans for the institution.

At the exit meeting, the examiners will solicit bank management's commitment to correct all material weaknesses found during the examination and will, when appropriate, offer examples of acceptable solutions to identified problems. In preparing conclusions, the examiners will consider the significance and benefit of their recommendations and the potential impact, in expense, for example, on the bank's operations.

It may be appropriate for examiners to conduct departmental exit meetings with the management of specific functional areas or departments before the final exit meeting. Significant issues and commitments for corrective actions from these meetings will then be summarized by the departmental EICs for presentation to senior bank management at the final exit meeting.

Report of Examination

The report of examination is the OCC's primary vehicle for communicating examination findings in writing to a bank's board of directors. It focuses the board's attention on major examination conclusions, including any significant problems and actions needed to address them. It records the examiner's conclusions and concerns, and the actions the bank has committed to take. It also communicates the bank's strengths, weaknesses, problems, and matters requiring board attention.

Examination reports must:

- Be consistent with the tone, findings, and conclusions communicated to the bank during the examination.
- Address the appropriate audience depending on the bank's structure and how it is managed.
- Communicate the condition of the bank or, if appropriate, the condition of an operational unit within the bank.
- Discuss any significant unwarranted risks or significant deficiencies.
- Summarize required actions and commitments to correct deficiencies.
- Be written effectively in a concise manner to ensure issues are understandable.

Review Process

The examination review process verifies the accuracy and completeness of the report of examination and appropriate supervisory information, documents summary communications with the board and management of the bank, and ensures appropriate strategies are developed for the next examination cycle. The review process includes

- Completing the report and the risk assessment system (RAS),
- Meeting with the bank's board of directors,
- Finalizing SMS records, including the RAS, and
- Distributing the report to complete the examination cycle.

Draft Comments to Bank Management

Before finalizing the report of examination, the EIC will provide a draft of the examination conclusions and matters requiring board attention to bank management so they may review the comments for accuracy. Before providing draft copies to bank management, however, the EIC will discuss matters of significant supervisory concern contained in draft comments with the supervisory office.

Meetings with the Board of Directors

Meetings with the board are an important part of the examination process and should be conducted with the utmost professionalism. The EIC will meet with the board of directors or an authorized committee that includes outside directors after board or committee members have reviewed the report of examination findings. At the meeting, the EIC will discuss:

- The objectives of OCC's supervision and how the OCC pursues those objectives.
- Strategic issues including growth, products, and strategies.
- Major concerns or issues, including significant risks facing the bank.
- The bank's success or failure in correcting previously identified deficiencies.
- The impact of failing to correct deficiencies.
- What the OCC expects the bank to do and when (i.e., action plans, supervisory strategies, and commitments).
- What the bank is doing well.
- Industry issues affecting the bank.

Examiners will use graphics and handouts when appropriate. The supervisory office management, or designee, will attend the board meeting. The meeting will provide an opportunity for board members to make comments and ask questions. If there are significant disagreements regarding the final examination conclusions, OCC personnel should advise the board of the OCC's examination appeals process.

The EIC must document the meeting in an "Other Significant Event" (OSE) comment in SMS.

Setting a New Supervisory Strategy

The end of one statutory examination cycle is in reality the beginning of the next. At a minimum, a new supervisory strategy is produced. The supervisory strategy must be based on areas of supervisory concern noted in examination activities, while also considering the risk assessments of the institution, developments in the financial services industry, and any OCC or regulatory initiatives. As appropriate, specialty area examiners should assist the bank EIC

in developing a suitable strategy addressing specialty areas. If a bank has no significant deficiencies, its supervisory strategy will focus on assuring that the bank's management and systems continue to function properly to allow effective risk management. Supervisory strategies are updated, as needed, throughout the supervisory cycle.

To develop a supervisory strategy for a bank, the EIC must consider three elements: supervisory objectives, activities, and work plans. Supervisory objectives define the goals for the specific institution based on its risk profile and other applicable statutory or agency standards. Well-defined objectives allow supervisory activities to be focused and efficient. They also help OCC managers gauge the effectiveness of supervisory strategies. Activities are the steps that will achieve supervisory objectives. Activities should link directly to supervisory objectives and must include plans for communicating with management and the board of directors. Work plans describe how strategies will be achieved and outline:

- The timing and location of examination activities.
- The nature, scope, and depth of the review by examination work program.
- The personnel resources needed.
- The follow-up activities to be undertaken.

See the "Bank Supervision Process, "Large Bank Supervision," and "Community Bank Examination Procedures for Noncomplex Banks" booklets of the Comptroller's Handbook for a full description of supervisory strategies.

Closing Out the Examination Cycle

The statutory examination cycle ends with the completion of all the activities necessary for a full-scope, on-site safety and soundness examination as set out in the strategy. The examination cycle for specialty area examinations may not necessarily coincide with the statutory examination cycle (refer to the Examination Scheduling segment of this booklet). The EIC and reviewing official are responsible for ensuring the accuracy and completeness of supervisory information. The supervisory office is responsible for reviewing and approving the revised strategy. (Refer to Examining Circular 263, "SMS Documentation Policy," and applicable SMS technical bulletins for SMS data entry standards and guidance.)

Follow-Up Activities

Examiners must follow up on identified weaknesses and problems, particularly matters requiring board attention. The examiner must ensure that corrective actions taken by bank management address material deficiencies and can be accomplished within agreed-upon time frames. Specific follow-up activities for examiners may include requesting periodic reports from the bank, making telephone calls, scheduling reviews, and arranging meetings. Such activities may reveal the need to alter a bank's supervisory strategy to meet changing conditions or circumstances.

Examiners with ongoing responsibility for supervising banks will:

- Respond to information received from the bank within 30 days of receipt.
- Document follow-up activities in SMS.
- Change supervisory strategies as conditions, risk, or industry warrant.
- Maintain ongoing contact with bank senior management.

1. Prepare for supervisory activities, including the on-site examination, in an efficient manner.
2. Select and structure examination programs that target the goals and objectives of the supervisory strategy.
3. Ensure that the examination is conducted in a professional manner.
4. Establish controls and record keeping systems to communicate examination findings effectively.
5. Maintain review processes to ensure that prescribed work is completed and that working papers support the conclusions.

The following are the procedures to be used, as warranted, by EICs or their designees to accomplish the supervisory goals and objectives of the examination.

Examination Planning

1. Review the following to identify the preliminary scope and objectives of the examination
 - Supervisory strategy
 - Follow-up analysis
 - Risk assessment system
 - Other unresolved concerns
2. Discuss the bank and associated risks with the portfolio manager.
3. Create an examination packet that includes:
 - A copy of the previous full-scope, on-site safety and soundness examination report.
 - Copies of the most recent reports resulting from other supervisory activities (e.g., specialty area examinations).
 - Other agency reports as appropriate (e.g., holding company reviews).
 - Printed copies of the bank's most recent UBPR and Lotus-based models (e.g., BERT).
 - A report diskette that contains all mandatory core pages, optional core and supplemental pages as needed, and downloaded financial data from NBSVDS.
 - Printed copies of supervisory information comments and data screens.
4. Continue the pre-examination analysis by
 - Reviewing the following, as appropriate:
 -) The most recent full-scope, on-site safety and soundness report and speciality area reports
 -) All relevant supervisory information comments
 -) Enforcement actions or referrals, if applicable
 -) Holding company or chain bank reviews

-) Correspondence received and sent
 -) Working papers from the most recent examination, carrying forward the most relevant material
 -) OCC supervision priorities for the current year
 -) The UBPR
 -) Community contact forms
 -) Consumer complaints (from CATS or CCIS)
 -) Lending, demographic, and economic reports (e.g., CRAWiz)
- Discussing significant items or matters noted in the above review with the supervisory office analyst, field manager, or portfolio manager, as appropriate.
5. To the extent practical and consistent with principles of safety and soundness, coordinate the examination with other federal banking agencies, if warranted.
 6. Before the start of the examination, discuss the following with bank management:
 - The timing of the examination.
 - The scope and objectives of the examination.
 - General information about examiners' schedules, staffing levels, and projected time during which examiners will be at the bank.
 - Significant changes in bank products or services (see appendix B, "Checklist of Services Offered").
 - Changes in bank management or operations.
 - The availability of key bank personnel during the examination.
 - Significant changes in the local economy or business conditions.
 - Any areas the bank wants the OCC to consider for review.
 7. After contacting the bank, but no later than three weeks before the start of the examination, send a request letter to the bank that provides:
 - The examination start date.
 - The scope and objectives of the review.
 - Advance information the bank must provide to the examination team, with due dates.
 - Information the bank must have available for the examiners at the beginning of the examination.
 - The name and telephone number of the OCC contact.

(Note: For noncomplex community banks, use the standard request letter from the "Community Bank Examination Procedures for Noncomplex Banks" booklet of the Comptroller's Handbook. For community bank

compliance examinations, use the standard request letter from the “Community Bank Consumer Compliance” booklet. There currently are no standard request letters for fiduciary or BIS examinations. The supervisory office must approve any additions to the standard request letter for noncomplex community banks. For complex or large banks, customize the request letter based on the supervisory strategy and consultation with the appropriate supervisory official.)

8. Finalize the scope and objectives of the examination. If needed, modify the supervisory strategy by:
 - Noting the modification at the end of the current strategy in the supervisory information database.
 - Obtaining approval from the supervisory office.
 - Archiving and saving the modified strategy in the supervisory information database.
9. Determine staffing assignments and examination time frames
 - To maintain an even workload.
 - To identify and schedule the expertise needed.
 - To promote the training and professional development of examining personnel.
 - To avoid duplication of effort.
 - To complete the examination on schedule.
10. Prepare a written scope memorandum to address the following relevant examination details:
 - Goals and objectives.
 - Specific procedures for each supervisory area.
 - Personnel assignments and individual expectations.
 - Workday schedule and time frames.
 - Guidelines for communicating with bank management.
 - Planned sampling methods.
 - Working paper requirements including conclusion memorandums and report comments.
 - Administrative issues including work locations, travel considerations, equipment, supply and reference material needs, time summary reporting requirements, charter numbers, and work place security.

(Note: Program-specific scope memorandums may be appropriate depending on the size of the examination or institution.)

11. Communicate with staff

- To review the scope memorandum.
- To resolve scheduling or logistical issues.
- To identify examination team leaders.
- To address any addenda to the supervisory strategy.
- To provide a general overview of consumer and fair lending complaint information, as well as the supervising office's CRA file (if these areas are part of the examination scope).

Examination Management

12. Open the analysis (or analyses) in SMS using the date on which the examination begins. If a fiduciary analysis is opened, follow district procedures to open the trust billing system.
13. Meet with the CEO and appropriate members of senior management or board members at the beginning of the examination
 - To explain the scope of the examination, the role of each examiner, and how the team will conduct the examination.
 - To confirm the availability of bank personnel.
 - To identify communication contacts.
 - To answer any questions they may have.
14. If necessary, meet with the examination staff at the beginning of the examination to confirm
 - Objectives
 - Budgeted workdays
 - Assignments and due dates
 - Administrative duties
 - Guidelines for contact between the examining team, bank management, and OCC supervisory offices
15. Meet periodically with examiners
 - To determine the progress of the examination.
 - To discuss preliminary findings before holding discussions with bank management.

(Note: In addition to determining preliminary findings, the EIC must be aware of issues such as running over or under the budget, progress of training, and any emerging communication problems with bank staff. The EIC will assess and reallocate resources as needed.)

16. Periodically review work products of examiners to ensure quality and to evaluate examiner performance.
17. Meet with bank management regularly to discuss ongoing issues, obtain additional information, and keep management informed of the progress of the examination.
18. Maintain contact with the appropriate supervisory office regarding examination progress, preliminary findings, and other significant issues.

(Note: Communication with a district's legal staff, subject matter experts, or specialty examiners [consumer/CRA, fiduciary, BIS] may be appropriate for unusual situations, significant violations, proposed enforcement actions, interagency referrals, or other significant supervisory matters.)

19. Review the working papers before the end of the examination to ensure support for conclusions and potential enforcement actions or civil money penalty referrals.
20. Use tracking systems, as warranted, to keep the examination organized. Examples of tracking systems include:
 - Tracking sheets to monitor adherence to budgeted time frames and to identify and explain variances.
 - Formal communications with bank management detailing important examination findings.
 - Spreadsheets to track classification totals, grading changes, and other pertinent data.
 - Checklists to ensure that administrative details are completed (such as performance feedback and time and travel report forms.)
 - Periodic status reports to update findings and assess progress in completing assignments.
21. Hold an exit meeting with management to summarize examination findings. Solicit management's commitment to correct material weaknesses. Inform management of areas of success and also identify areas with weaknesses. Discuss the bank's risk profile including conclusions from the risk assessment system. Offer examples of acceptable solutions.

Examination Review and Closing

EIC Responsibility

22. The EIC, or designee, should finalize a brief comment for each UFIRS area (and specialty area, as applicable). Significant concerns according to the risk assessment system should receive comment. Complete all other required report pages and any applicable attachments.
23. Detail matters requiring board attention (MRBA), if any. These matters must relate to any deviations from sound fundamental principles that, if not addressed, are likely to result in financial deterioration of the bank or substantive noncompliance with laws.
24. Discuss examination conclusions and review draft report comments with the field manager and the appropriate supervisory office official.
25. Summarize examination conclusions and the bank's condition in the "Examination Conclusions" page of the report. If applicable, prepare a MRBA report comment page.
26. Provide an approved draft of examination conclusions and MRBA comments to bank management to allow them to review the comments for accuracy.
27. Perform a final technical check to make sure the report is acceptable. The check should:
 - Ensure that the report meets established guidelines.
 - Ensure that comments support the composite and UFIRS component ratings (and specialty ratings, as applicable).
 - Foot all numerical totals.
 - Ensure consistent use of all numerical data between the report and supervisory information comments and data records.
 - Verify that violations of law cites are accurate.
28. If there is an MRBA comment in the report, upload that comment directly to a SMS follow-up analysis (type 75). The comment also should reflect management's ability to:
 - Resolve noted problems or issues.
 - Manage the current level of risk (including the likely effects of inaction).

29. Upload the examination conclusions report comment to the SMS analysis comment. Supplement the analysis comment, when appropriate, to include:
 - The scope of the examination.
 - The reasons for changes in the scope of the supervisory strategy for the bank.
 - The findings and conclusions, including the reasons for recommended enforcement actions or civil money penalty referrals.
 - Reasons for rating changes or confirmations.
30. If applicable, open in SMS a type 70 Bank Secrecy Act (BSA) analysis and upload comments to document citations of violations of 31 CFR 103 (as listed in PPM 5000-13 [REV] and 12 CFR 21.21).
31. Update supervisory information comments (i.e., SMS overall summary comments background section and condition section if applicable).
32. Prepare the supervisory strategy for the next examination cycle and update to the supervisory information database.
33. Update SMS supervisory data records concerning:
 - Risk assessments
 - Ratings
 - Asset statistics
 - Violations
 - BIS process indicator
 - Institution indicators
 - Complexity designation
34. Prepare the report and supervisory information comments and records for final review by the supervisory office.
35. Complete and distribute assignment evaluations.
36. Sign the report.
37. Schedule the board meeting.

Supervisory Office Responsibility

38. Review the report and supervisory information comments for content and ensure compliance with established OCC policies.

39. Complete the quality-assurance-related "Supervisory Office Review" form.
40. Archive and save SMS background and strategy comments. Archive and save SMS condition comment, if applicable.
41. Approve all SMS supervisory data records (e.g., ratings, asset statistics, violations, BIS process indicators, institution indicators, risk assessment system, and complexity designation).
42. Perform and document the "SMS Noncomplex Bank Post-Examination Survey" and the "SMS Post-Examination Survey for Community Bank Consumer Compliance Examination Procedures," as applicable.
43. Attach the examination survey questionnaire to the bank's copy of the report.
44. Distribute and mail the report to the appropriate locations once it has been reviewed and approved by the supervisory office.

Board Meeting

45. Conduct the meeting after the board, or an authorized committee, has had the opportunity to review the draft report or a synopsis of examination findings. At the meeting, graphics and handouts should be used when appropriate so that the examiner can describe:
 - The objectives of OCC's supervision and how the OCC pursues those objectives.
 - Strategic issues including growth, products, and strategies.
 - Major concerns or issues, including significant risks facing the bank.
 - The bank's success or failure in correcting previously identified deficiencies.
 - The impact of failing to correct deficiencies.
 - What the OCC expects the bank to do and when (i.e., action plans, supervisory strategies, and commitments).
 - What the bank is doing well.
 - Industry issues affecting the bank.

(Note: The supervisory office official, field manager, or designee will attend the board meeting.)

46. Document details of the meeting in the supervisory information database (i.e., other significant events [OSE] in SMS). The EIC will include the following information in the OSE:

- The date and location of the meeting and attendees.
- Major items discussed.
- A brief summary of the director's reactions to the examiner's briefing. (The OSE can refer the reader to the type 75 follow-up analysis comment for further details on any commitments obtained from the board or senior management).

47. Close-out examination analysis (or analyses) in SMS.

Interagency Policy Statement on Examination Coordination and Implementation Guidelines June 10, 1993

This statement outlines a program for coordinating examinations of insured depository institutions and inspections of their holding companies by the federal financial regulatory agencies. This program expands on existing interagency agreements, and responds to the industry's concern over the increased burden on organizations supervised by multiple regulatory agencies.

The objective of the program is to minimize disruption and avoid duplicative examination efforts and information requests, whenever possible. The significant elements of the program include:

- Coordinating the planning, timing, and scope of examinations and inspections of federally insured depository institutions and their holding companies.
- Conducting joint interagency examinations or inspections, when necessary.
- Coordinating and conducting joint meetings between bank and bank holding company management and the regulators.
- Coordinating information requests.
- Coordinating enforcement actions, when appropriate.

The program emphasizes full cooperation and coordination by the agencies in supervising large banking organizations and organizations that are in less than satisfactory condition. Additional effort will also be made to reduce the regulatory burden on the remaining population of depository institutions.

Guidelines for implementation of the program follow.

Implementation Guidelines

1. Purpose

These guidelines were developed to strengthen coordination and cooperation among the federal banking agencies in examining and supervising banking organizations and to carry out the provisions of the March 10 Interagency Policy Statement intended to minimize the disruptions and burdens associated with the examination process. The provisions are:

- Eliminate duplication in examinations by multiple agencies, unless clearly required by law.
- Increase coordination of examinations among agencies when duplication is required.
- Establish procedures to centralize and streamline examinations in multibank organizations.

These guidelines address the coordination of the examinations by federal agencies of depository institutions and the inspections of their holding companies. To achieve the desired strengthening in the coordination of the federal agencies' examination/inspection activities, the guidelines focus on the planning, staffing, timing, and conduct of examinations and inspections; the conduct of joint management meetings to discuss inspection and examination findings; and other areas of mutual concern.

2. Primary Supervisory and Coordination Responsibility

Examinations/inspections of a particular legal entity will be conducted by the federal regulatory agency that has primary supervisory authority for that entity. In carrying out its supervisory responsibilities for a particular entity within a banking organization, each regulatory agency will rely on examinations/inspections conducted by the primary regulator of the affiliate to the extent possible, thereby avoiding unnecessary duplication and disruption to the banking organization. In certain situations, however, it may be necessary for a regulatory agency other than the entity's primary supervisory authority to participate in the examination or inspection of the entity in order to fulfill its regulatory responsibilities. These guidelines provide procedures for handling such situations.

Primary supervisory authority and coordination responsibilities are organized as follows:

OCC	national banks
FDIC	state nonmember banks
OTS	thrift holding companies and savings associations
FRB	parent bank holding companies, nonbank subsidiaries of bank holding companies, the consolidated bank holding company and state member banks

The primary federal regulator is responsible for scheduling, staffing and setting the scope of supervisory activities, including coordinating formal and informal administrative actions, as necessary. In fulfilling these responsibilities, the primary regulatory agency should consult closely with the other appropriate agencies when there is need for coordination.

3. Overview

The agencies will make every effort to coordinate the examinations and the inspections of banking organizations. Coordinated examinations and inspections may not be practical in all cases because of resource constraints, serious scheduling conflicts, or geographic considerations; however, particular emphasis for implementing this program will be placed on banking organizations with over \$10 billion in consolidated assets and those banking organizations (generally, with assets in excess of \$1 billion) that exhibit financial weaknesses.

4. Pre-Examination Coordination

Where multiple regulators have authority over a legal entity, representatives from the appropriate supervisory offices should meet quarterly as necessary to discuss supervisory strategies for specific banking organizations, and at least annually to review and establish examination and inspection schedules, to plan for the next year, and to consider the need for coordination in the following areas:

- Sharing the strategy and scope of each examination/inspection.
- Determining if agencies other than the primary regulator of a particular entity should participate in the examination/inspection of that entity.
- Determining whether a consolidated request letter should be prepared to avoid duplicative information requests.

- Sharing examination/inspection work papers and resulting findings and conclusions from prior examination/inspection efforts.
- Other areas as necessary.

5. Interagency Review of Bank, Nonbank, and Parent Company Activities

Certain areas or functions transcend legal entity distinctions, such as internal audit, credit review and the methodology for determining the allowance for loan and lease losses. Such functions may be located at the bank or holding company level. The primary regulator of the depository institution and the holding company may both have supervisory responsibility to assess such functions. In these cases, examinations or inspections of such areas should be conducted on a coordinated and concurrent basis to avoid duplicative reviews and unnecessary disruption.

The primary regulator of the entity being examined/inspected should take the lead on such a coordinated examination or inspection, unless there is mutual agreement that another agency will serve as the lead agency. The responsibilities of the lead agency, in consultation with other appropriate agencies, include developing the scope of the examination or inspection and determining the staff requirements. The lead agency will also coordinate examination/inspection scheduling and the presentation of examination/inspection findings to the appropriate management.

6. Coordination of Management Meetings

At the conclusion of examinations and inspections conducted under these guidelines, the agencies should coordinate and plan joint meetings with the board of directors to discuss the findings and conclusions. Agencies will be guided by the coordination responsibility definitions outlined in provision 2 of this program, unless otherwise agreed upon.

7. Process for Handling Significant Differences Between the Agencies in Findings, Conclusions, and Recommendations

Prior to forwarding examination and inspection results to management or boards of directors, every effort should be made to resolve any significant differences concerning major findings, conclusions, and recommendations.

Such differences should be resolved by examiners, or officials at the regional level, within 10 business days of identification. If resolution cannot be

achieved following full review and communication between the regional offices, the matter should be referred to the national level, where it will be resolved within a reasonable time frame.

8. Inspection and Examination Reports

The primary regulator will prepare the formal report of examination or inspection covering the entity for which it is the primary federal regulator and in those cases for which it serves as the lead agency. The report should be addressed and transmitted to the directors of the entity for which the regulator is the primary federal supervisory authority and, as necessary, it may be sent to the directors of other entities that have a need for the information. The agencies may mutually agree, if necessary and appropriate, to prepare a joint report.

9. Information Requests

Any request for information to be obtained from an entity for supervisory purposes should normally be made through the entity's primary regulator. The primary regulator should also share relevant supervisory information with the other appropriate regulatory agencies.

10. Coordinating Enforcement Actions

When enforcement action is contemplated by one or more regulatory agencies, consideration should be given to initiating a joint enforcement action to address and correct deficiencies within a banking organization. At a minimum, each agency considering enforcement action should inform other regulatory agencies. This provision reaffirms the existing interagency enforcement agreement.

11. Other Matters

The agencies will establish arrangements to monitor coordination efforts and to resolve any differences that arise under this program.

The agencies will also endeavor to coordinate with state banking departments, where appropriate and feasible.

Checklist of Services Offered

Note: Examiners should be mindful of which services are provided to or by bank affiliates of the bank being examined. This information will help determine the necessary scope of an insider and affiliate examination.

Description of Service	Is Service Provided?		Comments
	Yes	No	
Credit Services:			
Acquisition financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Agricultural lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Asset-based financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Collection services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Commercial lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Commercial real estate lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Consumer credit	<input type="checkbox"/>	<input type="checkbox"/>	_____
Credit approval services	<input type="checkbox"/>	<input type="checkbox"/>	_____
• Authorization services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Credit cards/debit cards	<input type="checkbox"/>	<input type="checkbox"/>	_____
Development lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Home equity lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
International lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Lease financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Leveraged lease financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Merchant discount activity	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Residential mortgage lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Municipal credit	<input type="checkbox"/>	<input type="checkbox"/>	_____
Specialized industry financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Tax-exempt lending	<input type="checkbox"/>	<input type="checkbox"/>	_____
Trade financing	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____

Checklist of Services Offered (Continued)

Description of Service	Is Service Provided?		Comments
	Yes	No	
Investment Services:			
Cash flow management/cash management services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Discount brokerage services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Financial consulting	<input type="checkbox"/>	<input type="checkbox"/>	_____
Futures commission merchant	<input type="checkbox"/>	<input type="checkbox"/>	_____
Investment advisory services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Mutual fund and annuity sales	<input type="checkbox"/>	<input type="checkbox"/>	_____
Derivatives trading	<input type="checkbox"/>	<input type="checkbox"/>	_____
Securities processing and/or clearance services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Securities trading	<input type="checkbox"/>	<input type="checkbox"/>	_____
• Government	<input type="checkbox"/>	<input type="checkbox"/>	_____
• Municipals	<input type="checkbox"/>	<input type="checkbox"/>	_____
Securities underwriting	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Deposit Services:			
Automatic transfer accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Cashiers' checks	<input type="checkbox"/>	<input type="checkbox"/>	_____
Clearinghouse services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Collection services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Demand deposit accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Gift checks	<input type="checkbox"/>	<input type="checkbox"/>	_____
Holiday/club accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Messenger services	<input type="checkbox"/>	<input type="checkbox"/>	_____
Money market deposit accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Negotiable certificates of deposit	<input type="checkbox"/>	<input type="checkbox"/>	_____
NOW accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Passbook savings accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Statement savings accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Time deposit accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____

Checklist of Services Offered (Continued)

Description of Service	Is Service Provided?		Comments
	Yes	No	
Other Services:			
Insurance	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
Trust	<input type="checkbox"/>	<input type="checkbox"/>	_____
Corporate trusts/agencies	<input type="checkbox"/>	<input type="checkbox"/>	_____
Custodial accounts/agencies	<input type="checkbox"/>	<input type="checkbox"/>	_____
Employee benefit accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
In-house systems	<input type="checkbox"/>	<input type="checkbox"/>	_____
In-house operation processing	<input type="checkbox"/>	<input type="checkbox"/>	_____
Investment manager accounts	<input type="checkbox"/>	<input type="checkbox"/>	_____
Mutual funds	<input type="checkbox"/>	<input type="checkbox"/>	_____
Advisor capacity	<input type="checkbox"/>	<input type="checkbox"/>	_____
Other capacity	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
BIS	<input type="checkbox"/>	<input type="checkbox"/>	_____
In-house system	<input type="checkbox"/>	<input type="checkbox"/>	_____
Microcomputer access to mainframe	<input type="checkbox"/>	<input type="checkbox"/>	_____
Microcomputers on local area network (LAN)	<input type="checkbox"/>	<input type="checkbox"/>	_____
On-site programmers	<input type="checkbox"/>	<input type="checkbox"/>	_____
Processing for other banks	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____
_____	<input type="checkbox"/>	<input type="checkbox"/>	_____

Chain Banks

OCC Issuances Examining Circular 233, "Supervision Program for Chain Banks"

Community Bank Scoring System

OCC Issuances Examining Circular 248, "Community Bank Scoring System"

Depository Institutions Disaster Relief

Laws 12 USC 3352, Emergency Exceptions for Disaster Areas

OCC Issuances OCC Bulletin 94-72, "Floods in Texas"
OCC Bulletin 94-56, "Working with Borrowers Affected by Recent Flooding in Texas"
OCC Bulletin 94-51, "Floods in Southeastern United States"
OCC Bulletin 94-45, "Working with Borrowers Affected by Recent Flooding in the South"
OCC Bulletin 94-16, "California Earthquake"
OCC Bulletin 94-4, "California January 17, 1994 Earthquake"
Banking Bulletin 93-49, "Depository Institutions Disaster Relief"
Banking Bulletin 93-43, "Working with Borrowers Affected by Recent Flooding in the Midwest"
Banking Bulletin 92-69, "Depository Institutions Relief Act of 1992"

Examination Scheduling

Laws 12 USC 1820(d)
17 USC 240.15

OCC Issuances Examining Circular 261, "Interagency EDP Examination, Scheduling, and Report Distribution"
OCC Bulletin 95-5, "Multiregional Data Processing Services"
PPM 5130-1(REV), "Supervision of Federal Branches and Agencies"
PPM 5200-1, "New Compliance Program"
PPM 5300-1, "Bank Information Systems Program"

Interagency Coordination

Laws 12 USC 1820(d)

OCC Supervision Policy

OCC Issuances Comptroller's Handbook, "Bank Supervision Process"
Comptroller's Handbook, "Large Bank Supervision"
Comptroller's Handbook, "Community Bank Risk Assessment System"
Comptroller's Handbook, "Community Bank Examination Procedures for Noncomplex Community Banks"
Comptroller's Handbook, "Community Bank Consumer Compliance"
Comptroller's Handbook, "Compliance Management System"
Comptroller's Handbook, "Community Reinvestment Act Examination Procedures"

Supervisory Monitoring System (SMS)

OCC Issuances OCC Bulletin 94-42, "Policy Changes to Streamline and Enhance Data Input"
Examining Circular 263, "Supervisory Monitoring System (SMS) Documentation Policy"
SMS Technical Bulletins