# Department of the Treasury Office of the Comptroller of the Currency

Congressional Budget
Justification and Annual
Performance Plan and Report

FY 2022

# **Table of Contents**

Section I – Budget Request	3
A – Mission Statement	3
B – Summary of the Request	3
1.1 – Resource Detail Table	5
1.3 – Object Classification (Schedule O) Obligations	6
D – Appropriations Language and Explanation of Changes	6
E – Legislative Proposals	6
Section II – Annual Performance Plan and Report	7
A – Strategic Alignment	7
B – Budget and Performance by Budget Activity	8
2.1.1 – Supervise Resources and Measures	8
Supervise Budget and Performance	8
2.1.2 – Regulate Resources and Measures	11
Regulate Budget and Performance	11
2.1.3 Charter Resources and Measures	12
Charter Budget and Performance	12
C – Changes in Performance Measures	13
D – Evidence-Building Activity	
Section III - Additional Information	14
A – Summary of Capital Investments	14

# <u>Section I – Budget Request</u>

#### A – Mission Statement

To ensure that national banks and federal savings associations operate in a safe and sound manner, provide fair access to financial services, treat customers fairly, and comply with applicable laws and regulations.

#### **B** – Summary of the Request

The Office of the Comptroller of the Currency (OCC) was created by Congress in 1863 to charter national banks; oversee a nationwide system of banking institutions; and ensure national banks are safe and sound, competitive and profitable, and capable of serving in the best possible manner the banking needs of their customers. Effective on July 21, 2011, Title III of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), transferred to the OCC the responsibility for the supervision of federal savings associations and rulemaking authority for all federal savings associations.

As of September 30, 2020, the OCC supervised 821 national bank charters, 53 federal branches and agencies, and 284 federal savings associations. In total, the OCC supervises approximately \$14.1 trillion in financial institution assets.

#### Goals:

The OCC has established three goals to affirm its mission: 1) The OCC fosters a safe, sound, and fair system of national banks, federal savings associations and federal branches of foreign banks and agencies of foreign banks that is a source of economic strength and opportunity that meets the evolving needs of consumers, businesses, and communities; 2) OCC employees are engaged, prepared, and empowered to meet its mission; 3) The OCC operates efficiently and effectively. To achieve its goals and objectives, the OCC organizes its programs under three activities: 1) Supervise; 2) Regulate; and 3) Charter. Effective supervision and a comprehensive regulatory framework are the key tools that the OCC uses to ensure that national banks and federal savings associations operate in a safe and sound manner and that they provide fair access to financial services and fair treatment of their customers. A robust chartering program allows new entrants into the financial services sector while ensuring that they have the necessary capital, managerial, and risk management processes to conduct activities in a safe and sound manner.

The OCC's priorities focus on strengthening the resiliency of the institutions subject to its jurisdiction through its supervisory and regulatory programs and activities.

The OCC receives no appropriated funds from congress for any portion of its operations. Operations are funded primarily (approximately 97 percent) from semiannual assessments levied on national banks and federal savings associations. Revenue from investments in Treasury securities and other income comprise the remaining three percent of the OCC's funding.

#### FY 2021 and 2022 Priorities

A major focus of the OCC's supervisory, regulatory, and charter programs for FY 2021 and forward involves reviews of existing regulations to consider changes consistent with safety and

soundness and fair treatment of bank customers, with the goal of enhanced regulatory coordination, reducing unnecessary regulatory burden, and increasing examination efficiency.

The COVID-19 pandemic and efforts to contain its spread in the United States caused a historic economic downturn in early 2020. While economic activity is rebounding, there is significant ongoing financial risk. The OCC is observing signs that credit risk is transitioning as the economic downturn affects customer ability to service debts. Credit risk is evolving as government assistance programs expire and unemployment levels remain elevated. Strategic risk is an emerging issue due to the impact on bank profitability of the historically low-rate environment and potential credit stress. Operational risk is elevated as banks respond to altered work environments, an evolving and complex operating environment, and cybersecurity threats. Compliance risk is also elevated due to a combination of altered work environments and the requirement to quickly implement new federal, state, and proprietary programs designed to support businesses and consumers.

The OCC will conduct examinations based on the risk profile of individual national banks and federal savings associations to ensure they are safe and sound, sufficiently capitalized, and comply with all laws and regulations, including consumer protection laws and regulations. Priorities and activities will include supervisory reviews of commercial and retail credit quality and control functions, cybersecurity and operational resiliency, the implementation of pandemic assistance programs such as the Coronavirus Aid, Relief, and Economic Security (CARES) Act's Paycheck Protection Program (PPP) and other federal, state, and bank-initiated forbearance and deferred payment programs, the impact of changing interest rate outlooks, implementation and preparedness for the current expected credit losses (CECL) accounting standard, preparation for the phaseout of the London Interbank Offering Rate (LIBOR), technological innovation, Bank Secrecy Act/Anti Money Laundering (BSA/AML) under delegated authority from Treasury's Financial Crimes Enforcement Network (FinCEN) and in line with Federal Financial Institutions Examination Council (FFIEC) guidance, and fair access and fair lending. Examiners will work to resolve problem national bank and federal savings association situations effectively by identifying problems at the earliest possible stage, clearly communicating concerns and expectations to bank management through Reports of Examination and appropriate enforcement actions and ensuring timely follow-up on needed corrective actions.

#### 1.1 – Resource Detail Table

Dollars in Thousands

	F	Y 2020	F	Y 2021	F	Y 2022	FY 2021 t	o FY 2022
Budgetary Resources		Actual	Es	timated	Es	timated	% CI	nange
	FTE	AMOUNT	FTE	AMOUNT	FTE	AMOUNT	FTE	AMOUNT
Revenue/Offsetting Collections								
Assessments	0	\$1,022,157	0	\$1,059,445	0	\$1,059,445	NA	0.00%
Interest	0	\$15,330	0	\$21,464	0	\$21,464	NA	0.00%
Other Income	0	\$18,075	0	\$13,791	0	\$13,791	NA	0.00%
Unobligated Balances from Prior Years	0	\$1,669,476	0	\$1,656,000	0	\$1,588,000	NA	-4.11%
Total Revenue/Offsetting Collections	0	\$2,725,038	0	\$2,750,700	0	\$2,682,700	NA	-2.47%
Expenses/Obligations								
Supervise	3,202	\$953,433	3,125	\$1,030,945	3,125	\$1,038,425	0.00%	0.73%
Regulate	318	\$94,738	332	\$109,481	332	\$110,275	0.00%	0.73%
Charter	69	\$20,519	66	\$21,715	66	\$21,873	0.00%	0.73%
Total Expenses/Obligations	3,589	\$1,068,690	3,523	\$1,162,141	3,523	\$1,170,573	0.00%	0.73%
Net Results		\$1,656,348		\$1,588,559		\$1,512,127	NA	-4.81%

- The Comptroller may impose and collect assessments, fees, or other charges as necessary or appropriate to carry out his responsibilities and to meet the expenses of the OCC. 12 U.S.C. 482. At September 30, 2020, the net position of the OCC was \$1,574.7 million.
- The Comptroller has sole authority to determine how OCC funds are obligated and its expenses incurred and paid. 12 U.S.C. 16.
- OCC funds are not appropriated funds or government monies. 12 U.S.C. 481.
- As part of its annual budget formulation process, the OCC re-evaluates the size of the reserve based on a disciplined analysis of the impact
  of material events on its ability to fund operations.

# 1.3 – Object Classification (Schedule O) Obligations

Dollars in Thousands

Dollars in Thousands			
	FY 2020	FY 2021	FY 2022
Object Classification	Actual Obligations	Estimated Obligations	Estimated Obligations
11.1 - Full-time permanent	554,034	570,242	575,944
11.3 - Other than full-time permanent	4,710	3,703	3,703
11.5 - Other personnel compensation	2,731	2,722	2,722
11.9 - Personnel Compensation (Total)	561,475	576,667	582,369
12.0 - Personnel benefits	237,138	272,903	275,632
13.0 - Benefits for former personnel	342	230	230
<b>Total Personnel and Compensation Benefits</b>	\$798,955	\$849,800	\$858,231
21.0 - Travel and transportation of persons	17,570	21,186	21,186
22.0 - Transportation of things	812	2,417	2,417
23.1 - Rental payments to GSA	68	79	79
23.2 - Rental payments to others	69,212	66,577	66,577
23.3 - Communication, utilities, and misc charges	17,725	21,084	21,084
24.0 - Printing and reproduction	535	592	592
25.1 - Advisory and assistance services	23,672	21,742	21,742
25.2 - Other services	26,141	31,117	31,117
25.3 - Other purchases of goods & serv frm Govt accounts	10,866	8,729	8,729
25.4 - Operation and maintenance of facilities	5,641	8,622	8,622
25.7 - Operation and maintenance of equip	58,783	73,618	73,618
26.0 - Supplies and materials	4,682	6,259	6,259
31.0 – Equipment	23,830	24,777	24,777
32.0 - Land and structures	4,856	25,158	25,158
33.0 - Investments and loans	5,000	0	0
42.0 - Insurance claims and indemnities	344	384	384
Total Non-Personnel	\$269,735	\$312,341	\$312,341
Total Budgetary Resources	\$1,068,690	\$1,162,141	\$1,170,572
Full-time Equivalents (FTE)	3,589	3,523	3,523

Amounts reflect obligations of annually appropriated resources, carryover balances, reimbursables, and transfers.

# **D** – Appropriations Language and Explanation of Changes

The OCC receives no appropriated funds from Congress.

## **E** – Legislative Proposals

The OCC has no legislative proposals.

# Section II – Annual Performance Plan and Report

### A – Strategic Alignment

In accordance with the *Government Performance and Results Act Modernization Act (GPRAMA)* of 2010, the Department of the Treasury is currently developing the FY 2022 – 2026 Departmental Strategic Plan. The Strategic Plan is scheduled for publication in 2022. The Annual Performance Plan will be updated in the FY 2023 President's Budget to reflect new departmental strategic goals and objectives. The OCC will publish a component plan that aligns bureau activities and priorities to the Department's by fall 2022, or within 12 months of the confirmation of a new Comptroller of the Currency.

As such, the OCC's nationwide staff of bank examiners conducts on-site and off-site reviews of banks and provides sustained supervision of these institutions' operations. Examiners analyze asset quality, capital adequacy, earnings, liquidity, and sensitivity to market risk for all banks, and assess compliance with federal consumer protection laws and regulations. Examiners also evaluate management's ability to identify and control risk and assess banks' performance in meeting the credit needs of the communities in which they operate, pursuant to the Community Reinvestment Act (CRA).

In addition, under the bank supervision program, the OCC will also:

- Approve or deny applications for new charters, branches, capital, or other changes in corporate or banking structure;
- Take supervisory and enforcement actions against banks that do not comply with laws and regulations or that otherwise engage in unsafe or unsound practices;
- Remove and prohibit officers and directors, negotiate agreements—both formal (i.e., public) and informal (i.e., non-public)—to change banking practices, and issue cease-and-desist orders as well as Civil Money Penalties (CMPs); and
- Issue rules and regulations, legal interpretations, supervisory guidance, and corporate decisions governing investments, lending, and other practices.

#### B – Budget and Performance by Budget Activity 2.1.1 – Supervise Resources and Measures

Dollars in Thousands

	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Resource Level	Actual	Actual	Actual	Actual	Actual	Estimated	Estimated
Expenses/Obligations	\$975,477	\$993,680	\$1,105,022	\$939,193	\$953,433	\$1,030,945	\$1,038,425
Budget Activity Total	\$975,477	\$993,680	\$1,105,022	\$939,193	\$953,433	\$1,030,945	\$1,038,425
Full-time Equivalents (FTE)	3,441	3,498	3,434	3,289	3,202	3,125	3,125

Performance Measure	FY 2016 Actual	FY 2017 Actual	FY 2018 Actual	FY 2019 Actual	FY 2020 Actual	FY 2020 Target	FY 2021 Target	FY 2022 Target
Percentage of National Banks and Federal Savings Associations with Composite CAMELS Rating 1 or 2	93	94	96	96	96	90	90	90
Percentage of National Banks and Federal Savings Associations That Are Categorized as Well Capitalized	96	97	95	98	99	95	95	95
Percentage of National Banks and Federal Savings Associations with Consumer Compliance Rating of 1 or 2	98	97	98	98	98	94	94	94
Rehabilitated National Banks and Federal Savings Associations as A Percentage of Problem National Banks One Year Ago (CAMEL 3,4, or 5)	43	40	44	15	23	40	40	40
Total OCC Costs Relative to Every \$100,000 in Bank and Federal Savings Associations Assets Regulated (\$)	9.65	9.49	9.12	8.07	7.78	8.10	7.71	7.71

#### **Supervise Budget and Performance**

(\$1,038,425 from revenue/offsetting collections):

An effective supervision program is the cornerstone of the OCC's activities that support its strategic goals. Specifically, the Supervise Program consists of ongoing supervision and enforcement activities that directly support the OCC's strategic goal to foster a safe, sound, and fair system of national banks, federal savings associations and federal branches of foreign banks and agencies of foreign banks that is a source of economic strength and opportunity that meets the evolving needs of consumers, businesses, and communities. The condition and risk management practices of national banks and federal savings associations, and requiring corrective actions when weaknesses are found, directly supports Treasury's goal to promote financial stability. In FYs 2020 and 2021, the OCC took a number of enforcement actions, including imposition of large CMPs to address violations of the Bank Secrecy Act and Anti-Money Laundering requirements, and/or failure to maintain effective risk management programs for enterprise-wide risk management, compliance risk management, internal controls, or IT risk governance that are commensurate with the bank's size, complexity, and risk profile.

#### **Description of Performance:**

Percentage of National Banks and Federal Savings Associations with Composite CAMELS Rating of 1 or 2:

The composite Capital Adequacy, Asset Quality, Management, Earnings, Liquidity, and Sensitivity (CAMELS) rating reflects the overall condition of a national bank or federal savings association. Bank regulatory agencies use the Uniform Financial Institutions Rating System, CAMELS, to provide a general framework for evaluating all significant financial, operational, and compliance factors inherent in a national bank or federal savings association. The rating scale is 1 through 5 of which 1 is the highest rating granted and represents the lowest supervisory risk. These CAMELS ratings are assigned at the completion of every supervisory cycle or when there is a significant event leading to a change in CAMELS.

The OCC established a target outcome measure that 90 percent of the institutions under its supervision have a composite CAMELS rating of 1 or 2. Such a rating is consistent with the strategic goal of a safe and sound banking system, that banks maintain adequate capital and liquidity and have strong risk management practices. As of September 30, 2020, 96 percent of national banks and federal savings associations earned composite CAMELS ratings of either 1 or 2. Degradation in CAMELS can reflect weaknesses in risk management systems that need corrective action. The OCC, consistent with Treasury's goals of boosting U.S. economic growth and promoting financial stability, has instructed bank examiners to identify and seek corrective action at the earliest stage to address potential problems or weaknesses. The OCC's primary focus is to ensure that CAMELS ratings are an accurate reflection of each institution's current financial position and risk controls, and thus the OCC would not prematurely restore a favorable CAMELS rating.

Percentage of National Banks and Federal Savings Associations that are Considered Well-Capitalized:

The Federal Deposit Insurance Act established a system that classifies insured depository institutions into five categories (well capitalized, adequately capitalized, undercapitalized, significantly undercapitalized, and critically undercapitalized) based on their capital levels relative to their risks. The OCC established a target outcome measure that 95 percent of national banks and federal savings associations will meet or exceed the well-capitalized threshold.

The OCC works closely with problem national banks and federal savings associations to develop rehabilitation plans. Such plans typically include directives to improve or restore capital levels. These efforts, combined with a more stable operating environment, have resulted in improvement in this performance measure since FY 2009. As of September 30, 2020, 99 percent of national banks and federal savings associations were classified as well capitalized.

Percentage of National Banks and Federal Savings Associations with Consumer Compliance Rating of 1 or 2:

To ensure fair access to financial services and fair treatment of national bank and federal savings association customers, the OCC evaluates an institution's compliance with consumer laws and regulations. Bank regulatory agencies use the Uniform Financial Institutions Rating System, Interagency Consumer Compliance Rating, to provide a general framework for evaluating significant consumer compliance factors inherent in an institution. Each institution is assigned a

consumer compliance rating based on an evaluation of its present compliance with consumer protection and civil rights statutes and regulations, and the adequacy of its operating systems designed to ensure continuing compliance. Ratings are on a scale of 1 through 5 of which 1 is the highest rating granted and represents the lowest risk for noncompliance. The target for FY 2021 remains unchanged at 94 percent. As of September 30, 2020, national banks and federal savings associations continue to show strong compliance with consumer protection regulations with 98 percent earning a consumer compliance rating of either 1 or 2. Under the Dodd-Frank Act, the OCC has enforcement and supervisory authority for those institutions with total assets of no more than \$10 billion.

#### Rehabilitated National Banks and Federal Savings Associations:

The OCC's early identification and intervention with problem financial institutions can lead to a successful rehabilitation. As of September 30, 2020, 23 percent of national banks and federal savings associations with composite CAMELS ratings of 3, 4, or 5 one year ago have improved their ratings to either 1 or 2 this year. In addition, there were no national bank or federal savings association failures in FY 2020 compared to the 2 failures in FY 2019 and 0 in FY 2018. The OCC continues to focus on the early identification and rehabilitation of problem institutions.

As previously noted, the OCC continuously takes steps through its Supervise and Regulate programs to make national banks and federal savings associations more resilient to financial stresses and to identify and obtain corrective action at an early stage, when problems can be addressed most successfully. These efforts include heightened capital and liquidity standards and increased emphasis on the need for stress testing, designed to provide financial institutions with stronger capital buffers to withstand unforeseen events. These are multi-year efforts that will continue in FY 2021 and beyond.

Total OCC Costs Relative to Every \$100,000 in National Bank and Federal Savings Association Assets Regulated:

The OCC measures the efficiency of its operations while meeting the increasing supervisory demands of a growing and more complex national banking system.

The OCC costs are those reported as total program operating costs that include obligations incurred in each fiscal year. National bank and federal savings association assets are those reported quarterly by national banks and federal savings associations on the Reports of Condition and Income. Total national bank and federal savings association assets represent the growth and complexity of the financial institutions under the jurisdiction of the OCC. This measure supports the OCC's strategic goal of efficient use of agency resources. The OCC's ability to control its costs while ensuring the safety and soundness of national banks and federal savings associations benefits all national bank and federal savings association customers. As of September 30, 2020, total OCC cost relative to every \$100,000 in assets regulated was \$7.78 compared to the FY 2020 target of \$8.10. The OCC continues to meet its efforts to ensure that resources are used prudently and that programs are carried out in a cost-effective manner ensuring that the OCC operates as efficiently and effectively as possible.

#### 2.1.2 – Regulate Resources and Measures

Dollars in Thousands

	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Resource Level	Actual	Actual	Actual	Actual	Actual	Estimated	Estimated
Expenses/Obligations	\$90,463	\$92,151	\$106,649	\$93,323	\$94,738	\$109,481	\$110,275
Budget Activity Total	\$90,463	\$92,151	\$106,649	\$93,323	\$94,738	\$109,481	\$110,275
Full-time Equivalents (FTE)	319	324	331	327	318	332	332

#### **Regulate Budget and Performance**

(\$110,275 from revenue/offsetting collections):

The Regulate Program supports the OCC's strategic goal of a vibrant and diverse system of national banks and federal savings associations that supports a robust U.S. economy. Specifically, the Regulate Program consists of ongoing activities that result in the establishment of regulations, policies, operating guidance, and interpretations of general applicability to national banks and federal savings associations. These regulations, policies, and interpretations may establish system-wide standards, define acceptable national banking and federal savings association practices, provide guidance on risks and responsibilities facing national banks and federal savings associations, or prohibit (or restrict) national banking or federal savings association practices deemed to be imprudent or unsafe. They also establish standards for ensuring fair access to financial services and fair treatment of national bank and federal savings association customers. This program includes establishing examination policies and handbooks; interpreting administrative, judicial, and congressional proceedings; and establishing the applicable legal and supervisory framework for new financial services and products.

#### Description of Performance:

The OCC has recently undertaken action to reduce regulatory burden on and expand economic opportunity, including in response to the pandemic. To implement a provision of the CARES Act, the agency adopted interim and final rules to temporarily lower the community bank leverage ratio and to provide a graduated transition back to its pre-pandemic level. The OCC issued a final rule to codify the agency's longstanding understanding that a bank may transfer a loan without affecting the permissible interest term. This rule clarifies banks' ability to serve consumers, businesses, and the broader economy effectively and effectively, particularly in times of economic crisis. To address sudden disruptions in financial markets as a result of the pandemic, the OCC issued an interim final rule and order to temporarily extend the maturity limits for short-term investment funds affected by the market effects of Covid-19. The agency also issued, after extensive opportunity for public input, a final rule strengthening and modernizing the agency's regulations under the Community Reinvestment Act (CRA). OCC actions also supported responsible innovation by regulated institutions. For example, the OCC issued an advanced notice of proposed rulemaking inviting comment on its rules governing banks' digital activities. This rulemaking is part of the agency's ongoing efforts to remain responsive to rapidly changing trends and technology developments in the financial marketplace.

OCC continued to support responsible industry innovation by offering a program of Office Hours and Listening Sessions, sponsored by its Office of Innovation, and established a voluntary

pilot program to support the testing of innovative products, services, and processes that could benefit consumers, businesses, and communities.

#### 2.1.3 Charter Resources and Measures

Dollars in Thousands

		FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2022
Resource Level		Actual	Actual	Actual	Actual	Actual	Estimated	Estimated
Expenses/Obligations		\$23,978	\$24,426	\$24,033	\$20,212	\$20,519	\$21,715	\$21,873
Budget Activity Total		\$23,978	\$24,426	\$24,033	\$20,212	\$20,519	\$21,715	\$21,873
Full-time Equivalents (FTE)		85	86	75	71	69	66	66
D.C. W	FY 2016	FY 2017	FY 2018	FY 2019	FY 2020	FY 2020	FY 2021	FY 2022
Performance Measure	Actual	Actual	Actual	Actual	Actual	Target	Target	Target
Percentage of Licensing Applications and Notices Completed within Established Timeframes	98	96	97	99	98	95	95	95

#### **Charter Budget and Performance**

(\$21,873 from revenue/offsetting collections):

The Charter Program consists of ongoing activities that result in the chartering of national banks and federal savings associations and the evaluation of the permissibility of structures and activities of national banks and federal savings associations and their subsidiaries. This includes the review and approval of new national bank and federal savings association charters, federal branches and agencies, mergers, acquisitions, conversions, business combinations, corporate reorganizations, changes in control, operating subsidiaries, branches, relocations, and subordinated debt issuances. By supporting the entry of new products and institutions into the financial system with a national charter in a manner consistent with safety and soundness, the Charter Program supports the OCC's strategic goals of assuring safety and soundness while allowing national banks and federal savings associations to offer a full competitive array of financial services.

#### Description of Performance:

Percentage of Licensing Applications and Notices Completed within Established Time Frames: The OCC's timely and effective approval of corporate applications contributes to the nation's economy by enabling national banks and federal savings associations to complete various corporate transactions and introduce new financial products and services. Delays in providing prompt decisions on applications and notices can deprive a national bank or federal savings association of a competitive or business opportunity, create business uncertainties, or diminish financial results. Time frames have been established for completing each type of application and notice. As of September 30, 2020, the OCC completed 98 percent of national bank and federal savings association applications and notices within the required time frame, above the target of 95 percent. The OCC will continue to meet its Charter Program goals by providing staff training, coordinating efforts between charter and supervisory staff on safety and soundness and compliance matters, issuing updated procedures, and maintaining an emphasis on accessibility

and early consultation with national bank and federal savings association organizers and others proposing national bank and federal savings association structure changes.

# **C – Changes in Performance Measures**

OCC has no changes in performance measures.

#### **D** – Evidence-Building Activity

The table below describes the OCC's major evidence-building activities and corresponding resources. Additionally, refer to the Executive Summary for a discussion of Treasury-wide evidence-building functions.

Type of Evidence	Major Activities and	Resource Types	Use
Building Activity	Planned Projects	resource Types	
Evaluation Collection and analysis of data to assess effectiveness and efficiency of programs, policies, or procedures  Estimated share of all Evidence-Building Activities:  20 %	Major activities:  OCC Strategic Operating Plan  FY 2021 and FY 2022 projects: Enterprise Workforce Planning	FTE Series 0301, 0343, 0570, 0110, 2210	<ul> <li>☑ For internal policy decision-making</li> <li>☑ During internal strategic management processes</li> <li>☐ By external partners (government)</li> <li>☐ By external partners (non-government)</li> <li>☐ By unaffiliated external researchers</li> <li>☐ Other (describe)</li> </ul>
Research Modeling or other systematic use of data to explore emerging issues or potential scenarios to generate new knowledge  Estimated share of all Evidence-Building Activities:  60 %	Major activities:  • Economic and financial research functions  • Issuance of interpretive letters that provide legal certainty for cryptocurrency activities  FY 2021 and FY 2022 projects:  • Economics to establish policy research workgroups in numerous areas with both internal and external SMEs  • Technology Modernization  • Single Supervisory Platform Project  • Enterprise Data Governance	FTE Series 0110, 0343, 0301, 2210	<ul> <li>☑ For internal policy decision-making</li> <li>☑ During internal strategic management processes</li> <li>☐ By external partners (government)</li> <li>☑ By external partners (non-government)</li> <li>☐ By unaffiliated external researchers</li> <li>☐ Other (describe)</li> </ul>

Type of Evidence Building Activity	Major Activities and Planned Projects	Resource Types	Use
Analysis Routine and frequent use of data that produces insights for decision making and program management  Estimated share of all Evidence-Building Activities:  15 %	<ul> <li>Major activities:</li> <li>Performance Measurement</li> <li>Financial sector and policy analysis</li> <li>Strategic analysis</li> </ul> FY 2021 and FY 2022 projects: <ul> <li>None</li> </ul>	FTE Series 0301, 0343, 0570, 0110	<ul> <li>☑ For internal policy decision-making</li> <li>☑ During internal strategic management processes</li> <li>☐ By external partners (government)</li> <li>☐ By external partners (non-government)</li> <li>☐ By unaffiliated external researchers</li> <li>☐ Other (describe)</li> </ul>
Statistics Collection, compilation, and processing of data for describing or estimating characteristics or	Major activities:  None	FTE Series 1160	<ul> <li>☑ For internal policy decision-making</li> <li>☑ During internal strategic management processes</li> <li>☐ By external partners (government)</li> </ul>
insights concerning groups  Estimated share of all Evidence-Building Activities:  5 %	FY 2021 and FY 2022 projects:  None		<ul> <li>□ By external partners         (non-government)</li> <li>□ By unaffiliated external         researchers</li> <li>□ Other (describe)</li> </ul>

#### Section III - Additional Information

#### A – Summary of Capital Investments

Modernizing the OCC's approach to bank supervision through standardizing data and information, reducing duplication of effort, and leveraging technology is an agency priority. A single supervisory platform will provide data, information, and analytics to OCC staff to assist in making better decisions, in near real time, to support the agency's mission.

The OCC Chief, Information Officer's (CIO) strategy aligns information technology initiatives and investments to the OCC's core mission, including the development of new or enhanced applications and services and the disposition of redundant or "end-of-lifecycle" applications, capabilities, and services.

The CIO strategy is implemented through the budget formulation and the Capital Planning and Investment Control processes. These processes ensure that all IT investments are aligned with the OCC's mission, goals, objectives, and target enterprise architecture before a project is funded. The OCC ensures funding and staff resources to address IT investment priorities and considers risk mitigation strategies for IT investments to ensure that they are meeting stated performance goals. Performance metrics are linked to the delivery, alignment, and achievement

of the OCC's strategic program objectives to support evaluation of cost effectiveness for each investment.

#### FY 2021 and 2022 Plans - The OCC has 4 major IT initiatives in FY 2021 and 2022:

- Server Support Services (SSS) The SSS supports the OCC's server Operations and Maintenance, including refreshes of End-of-Life hardware. The infrastructure staff continues to build out additional capacity and support server technology refresh, business resiliency, and enterprise storage capacity.
- Telecommunications Services and Support (TSS) TSS includes telecommunications Wide
  Area Network (WAN) and Local Area Network (LAN) infrastructure. Remote access to the
  OCC systems is facilitated via a virtual private network, dial-in, and cellular wireless access
  using two-factor authentication. This also includes messaging services supporting highly
  mobile bank examiners and the OCC workforce. In FY 2021, the OCC will continue to
  refresh telecommunication infrastructure to increase capacity, maximize uptime, and ensure
  maintenance and security are maintained.
- End User Services and Support (EUSS) EUSS includes help desk/customer service support, computer hardware and software operations and maintenance, mobile devices, printers, asset management, and desktop engineering and image management. In FY 2021, OCC will refresh mobile devices and begin the planning for the next computer refresh.
- Cyber Security (CS) CS includes technologies, processes and practices aligned to protect
  networks, computers, programs and data from attack, damage, or unauthorized access. In
  alignment with Federal and Treasury requirements, the OCC has transitioned the Agency's
  systems and applications into Information System Continuous Monitoring and Ongoing
  Authorization. In FY 2021, the OCC will continue to deploy additional cloud-based services
  to minimize dependence on the OCC Data Center for critical network security and
  infrastructure services.

A summary of capital investments, including major information technology and non-technology investments, can be accessed at:

 $\underline{https://www.treasury.gov/about/budget-performance/Pages/summary-of-capital-investments.aspx.}$