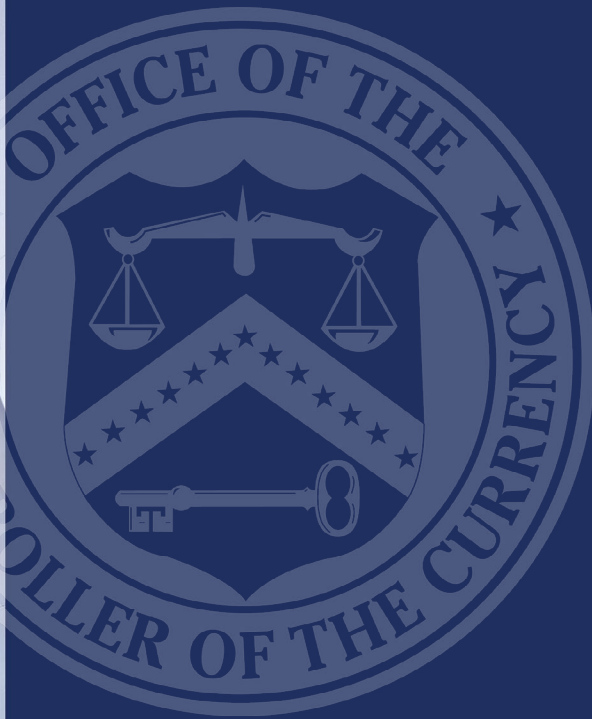


# Appeals Process for National Banks and Federal Savings Associations



November 2020

## Fair, Accessible, Reasonable

The Office of the Comptroller of the Currency (OCC) appeals process for national banks and federal savings associations (collectively, banks) provides an independent, fair, and binding means of resolving disputes arising during the supervisory process; helps ensure the most sound supervision decisions possible; and promotes open, continuous communication between banks and the OCC.

The OCC encourages early, informal resolution of concerns, but when disputes cannot be resolved informally or through the supervisory appeals process, the OCC Ombudsman provides an independent and objective review to determine whether supervisory decisions are reasonable based on available facts.

The OCC Ombudsman, who reports directly to the Comptroller of the Currency and operates outside of bank supervision, ensures that bankers have access to the appeals process and that appeals are reviewed fairly according to existing standards.

The OCC Ombudsman, with the consent of the Comptroller, may supersede any OCC decision or action during the resolution of an appealable matter.

The process works for financial institutions of all sizes and degrees of complexity supervised by the OCC.

### About the Appeals Process

OCC Bulletin 2013-15 details the appeals process and is available at [www.occ.gov/bankappealsbulletin](http://www.occ.gov/bankappealsbulletin).

Answers to frequently asked questions about the appeals process are available at [www.occ.gov/bankappealsfaqs](http://www.occ.gov/bankappealsfaqs).

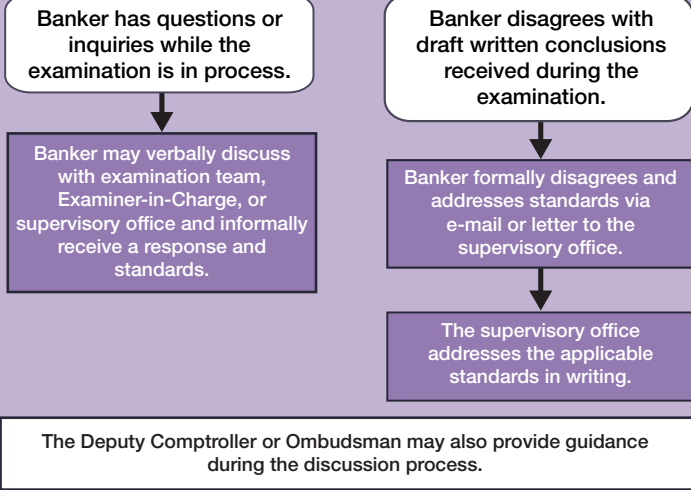
Summaries of appeals decisions are available at [www.occ.gov/topics/dispute-resolution/bank-appeals/summaries/index-summaries.html](http://www.occ.gov/topics/dispute-resolution/bank-appeals/summaries/index-summaries.html).

A report highlighting Ombudsman appeals in the last five years is available at [www.occ.gov/publications/publications-by-type/other-publications-reports/pub-ombuds.pdf](http://www.occ.gov/publications/publications-by-type/other-publications-reports/pub-ombuds.pdf).

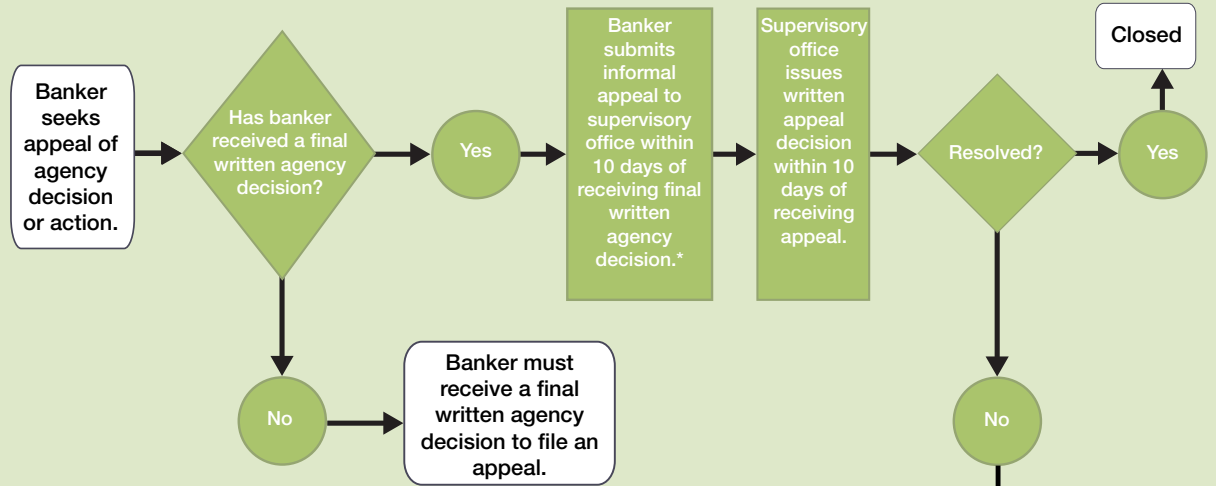
Matters that may not be appealed include appointments of receivers or conservators, preliminary examination conclusions, formal enforcement-related actions or decisions, formal or informal rulemaking, disclosures related to the Freedom of Information Act, and decisions subject to judicial review.



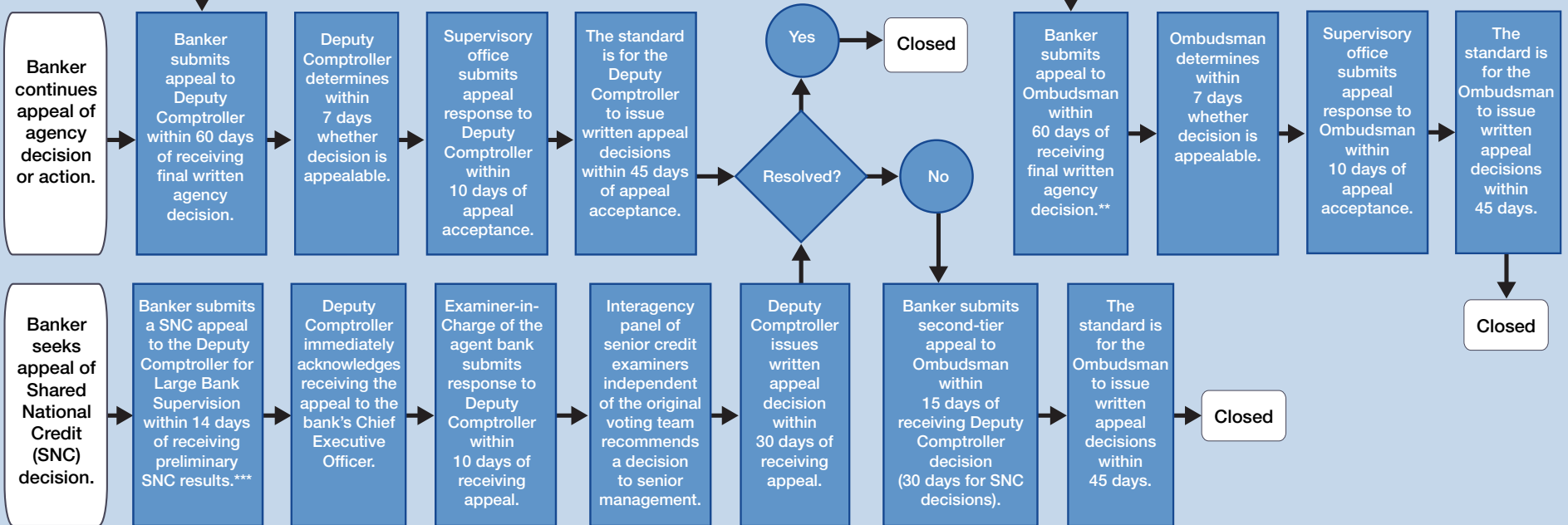
## Phase I: Discussion Process



## Phase II: Informal Appeals Process



## Phase III: Formal Appeals Process\*\*



Note: All time frames are stated as calendar days.

\* Fair-lending decisions must be appealed to the Ombudsman within 15 days of the agency's notification.

\*\* Following the final written agency decision, the banker may file a formal appeal with the Deputy Comptroller or the Ombudsman directly, without first filing an informal appeal.

\*\*\* Agent bank shall file an appeal within 14 days of notification by the Examiner-in-Charge of the preliminary disposition of the credit. A participant bank can appeal either through the agent bank or on its own within 14 days of receiving the preliminary SNC results from the agent bank. If the agent bank does not provide preliminary results, participant banks may file an appeal within 14 days of receiving the official SNC results from the primary regulator.