
Overall Conclusions Program

Examination Objectives

To formulate conclusions regarding the risks, condition, trends, management practices, and future prospects of the thrift.

To formulate conclusions on the safety and soundness of the thrift and propose supervisory action, if needed.

To record management's response to examination findings, conclusions, and proposed corrective action.

To effectively communicate conclusions and recommendations, both orally and in writing, in the Report of Examination according to common core ROE instructions and plain language principles.

Examination Procedures

Wkp. Ref.

1. Review analyses, comments, exceptions, and conclusions from the work papers, and perform the following:
 - Resolve any contradictory conclusions. Support all conclusions with facts obtained during the examination.
 - Determine the significance of the findings related to safety and soundness and overall regulatory compliance.
 - Discuss findings with appropriate institution personnel and verify conclusions as appropriate.

2. Review the draft CAMELS comments. Talk with assisting examiners about their overall CAMELS observations and findings applicable to the comments, and determine whether conclusions are reasonable.

3. Revise CAMELS comments so that they fairly represent examination results according to ROE instructions. Ensure conclusions are well supported in work papers and comments include any significant items noted in work papers. The tone and content of each comment should be concise and appropriate, as outlined in the Handbook.

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4. Review the preliminary CAMELS component ratings and meet with assisting examiners. You should consistently apply the standard criteria set by OTS for determining ratings. Follow definitions and instructions pertinent to the rating system to ensure national consistency.

5. If necessary, adjust the CAMELS component ratings using the instructions in Thrift Activities Regulatory Handbook Section 071, CAMELS Ratings. Review CAMELS comments again to ensure that they are consistent with the component ratings assigned.

6. Develop overall conclusions and prepare the Examination Conclusions and Comments page. Ensure the report is written in plain language.

7. Determine the composite rating by weighing the importance of various criteria used to develop conclusions. To ensure national consistency, you should follow the rating instructions in Thrift Activities Regulatory Handbook Section 071.

8. Review the Examination Conclusions and Comments page again to ensure the tone and content supports the assigned composite rating.

9. Discuss findings with management, typically the CEO. We recommend that you use an agenda. Discuss at least the following topics:

- The purpose of the meeting.
- All items that you might include in the examination report.
- Overall conclusions regarding the institution.
- Management's corrective action responses.

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- Composite and component ratings.
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10. After the meeting, correct any items in the ROE that are inaccurate, misleading, or misinterpreted.
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11. The Matters Requiring Board Attention page should include corrective actions, if appropriate. These include specific recommendations to correct deficiencies listed in the report, or recommendations for: supervisory agreements, consent agreements, cease-and-desist orders, receiverships, conservatorships, civil money penalties, and criminal referrals to appropriate agencies. For suspected violations of criminal statutes, the EIC should refer to Thrift Activities Regulatory Handbook Section 360, Fraud/Insider Abuse.
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12. Provide any information to the regional office that will be useful for revising the regulatory profile.
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13. Prepare the ROE cover page letter, if necessary, in accordance with regional office policy.
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14. Prepare to meet with the board of directors regarding findings. Refer to Thrift Activities Regulatory Handbook Section 320, Meetings with the Board of Directors, for instructions.
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15. Ensure that your review meets the Objectives of this Handbook Section.
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Examiner's Summary, Recommendations, and Comments

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