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General Accounting Office  
Washington, D.C. 20548

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General Government Division

B-280281

September 15, 1998

The Honorable Julie L. Williams  
Acting Comptroller of the Currency

Subject: The Results Act: Observations on OCC's Annual Performance Plan for Calendar Year 1998

Dear Ms. Williams:

This letter provides our observations on the Office of the Comptroller of the Currency's (OCC) calendar year<sup>1</sup> 1998 performance plan, which was submitted to Congress to meet the requirements of the Government Performance and Results Act of 1993 (the Results Act). We were asked by the House Committee on Banking and Financial Services to review the plan along with annual plans submitted by other financial regulatory agencies. This letter provides our assessment of how well OCC's performance plan meets the requirements of the Results Act and our observations for improving future performance plans.

Annual performance plans can be an invaluable tool for making policy decisions, improving program management, enhancing accountability, and communicating to both internal and external audiences how the long-term strategic direction outlined in strategic plans is translated into the day-to-day activities of managers and staff. Successful implementation of a performance-based management system, as envisioned by the Results Act, represents a significant challenge requiring sustained agency attention.

While opportunities exist to improve OCC's initial performance plan, actions to date clearly show a good-faith effort to implement the Results Act. On the basis of our discussions with your staff, we found OCC seriously committed to fulfilling both the requirements of the Act and congressional expectations that the plans inform Congress and the public about OCC's performance goals, including how the agency will accomplish the goals and measure the results. The points made in this letter are intended to assist OCC in its continued efforts

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<sup>1</sup>In cases where an agency operates on a fiscal year different from October 1 to September 30, the performance plan should correspond to the agency's fiscal year. OCC operates on a calendar year basis.

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to implement the Act. Therefore, the content of this letter focuses attention on areas where improvements might be made to enhance your plan and less on areas where OCC has already made significant progress.

## BACKGROUND AND APPROACH

In recent years, agencies have faced demands to be more effective and less costly, coupled with a growing movement toward a performance-based approach to management. Congress enacted the Results Act in 1993 as part of a framework of reform legislation that included the Chief Financial Officers Act and information technology reform legislation, such as the Clinger-Cohen Act of 1996, to address these demands and to instill performance-based management in the federal government. The Results Act is designed to improve the efficiency and effectiveness of federal programs by establishing a system to set goals for program performance and to measure results. The Act is intended to shift the focus of government decisionmaking and accountability away from a preoccupation with activities—such as bank examinations completed—to focus on the results of those activities—such as improvements in bank safety and soundness.

Under the Results Act, agencies are to develop strategic plans, annual performance plans, and annual performance reports. The strategic plan serves as the starting point and basic underpinning of the performance-based management system and includes the agency's mission statement and its long-term goals and strategies that agencies will use to achieve these goals. OCC submitted its first strategic plan under the Results Act to Congress and the Director of the Office of Management and Budget (OMB), as required, by September 30, 1997. In its 1997-2002 strategic plan, OCC established four strategic goals: (1) ensure bank safety and soundness, (2) foster competition, (3) improve the efficiency of bank supervision and reduce burden by streamlining supervisory procedures and regulations, and (4) ensure fair access to financial services for all Americans. The annual performance plan is to link the agency's day-to-day activities to its long-term strategic goals. The first performance plan, covering calendar year 1998, was submitted to OMB in the fall of 1997 and to Congress after the President's budget in February 1998. The first performance reports are due to Congress and the President no later than March 31, 2000. Performance reports are to evaluate the agencies' progress toward achieving the goals in their annual plans.

The Results Act requires federal agencies to prepare annual performance plans covering the program activities set out in the agencies' budgets. These plans are to (1) establish performance goals to define levels of performance to be achieved; (2) express those goals in an objective, quantifiable, and measurable form; (3) briefly describe the operational processes, skills, technology, and human, capital, information,

or other resources required to meet the goals; (4) establish performance measures for assessing the progress toward or achievement of the goals; (5) provide a basis for comparing actual program results with the established goals; and (6) describe the means used to verify and validate measured values.

For the purposes of our review, we collapsed the six requirements of the Results Act for annual performance plans into three core questions. These three core questions were as follows: (1) To what extent does the agency's performance plan provide a clear picture of intended performance across the agency? (2) How well does the agency's performance plan discuss the strategies and resources the agency will use to achieve its performance goals? (3) To what extent does the agency's performance plan provide confidence that its performance information will be credible? These questions are contained in our February 1998 congressional guide and our April 1998 evaluators' guide for assessing performance plans, which we used for our review.<sup>2</sup>

These guides integrated criteria from the Results Act, its legislative history, OMB guidance for developing performance plans (1997 OMB Circular A-11, part 2), a December 1997 letter to OMB from several congressional leaders, and our other reports on the implementation of the Results Act.<sup>3</sup> We used the criteria and questions contained in the guides to help us determine whether OCC's plan met the Act's requirements, to identify strengths and weaknesses in the plan, and to assess the plan's usefulness for executive branch and congressional decisionmakers.

We obtained oral comments on a draft of this letter from the Senior Deputy Controller for Administration and Chief Financial Officer and his staff. These comments are discussed near the end of this letter. We did our work between May and July, 1998, at OCC headquarters in Washington, D.C., in accordance with generally accepted government auditing standards.

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<sup>2</sup>See Agencies' Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking (GAO/GGD/AIMD-10.1.18, Feb. 1998) and The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans (GAO/GGD-10.1.20, Apr. 1998).

<sup>3</sup>See The Government Performance and Results Act: 1997 Governmentwide Implementation Will Be Uneven (GAO/GGD-97-109, June 2, 1997) and Managing for Results: Agencies' Annual Performance Plans Can Help Address Strategic Planning Challenges (GAO/GGD-98-44, Jan. 30, 1998).

## RESULTS IN BRIEF

OCC has made a good initial effort in preparing a performance plan that incorporates the basic elements required by the Results Act. As discussed in the sections that follow, the plan contains performance goals and measures that reflect OCC's mission and strategic goals and that cover all of the program activities in the agency's budget. However, the performance plan would be more useful if it incorporated (1) a clearer format to better present the plan's components, (2) better definitions of performance goals and targets and their linkage to strategic goals and annual objectives, (3) improved measures to capture performance goal results, (4) additional outcome-oriented performance goals and measures, (5) expanded descriptions of strategies and resources, and (6) expanded explanations of verification and validation efforts and data limitations.

### OCC'S PERFORMANCE PLAN SHOULD PROVIDE A CLEAR PICTURE OF INTENDED PERFORMANCE

The Results Act and OMB guidance call for a performance plan that clearly defines expected performance; connects mission, goals, and activities; and recognizes crosscutting efforts. Under the Act, the plan is required to provide a basis for an agency's comparison of actual results with performance goals. For this comparison, the agency needs to set goals and develop appropriate performance measures and show how it will use them to measure performance across the agency. By showing the relationship between the annual performance goals and the agency's strategic goals and mission, an agency's performance plan can demonstrate how the agency intends to make progress toward the achievement of its strategic goals. An agency's plan should also discuss the crosscutting nature of its programs and how it will contribute to achieving crosscutting performance goals.

Using these criteria, we found OCC's performance plan had performance goals and measures that reflected the agency's mission and strategic goals for program activities included in its budget. However, the plan could better define expected performance, and it could more explicitly connect OCC's mission, goals, and activities. In addition, the plan needs to explain in greater detail OCC's crosscutting efforts with other financial regulatory agencies.

#### Defining Expected Performance

The Results Act requires an agency's annual performance plan to contain both a set of annual goals that establish its intended performance and measures that can be used to assess progress toward achieving those goals. The Act defines a performance goal as a target level of performance that is expressed as a tangible, measurable objective

against which actual achievement can be compared and includes goals expressed as a quantitative standard, value, or rate. A performance measure is a tabulation, calculation, recording of activity or effort, or assessment of results that is compared to an intended purpose. A performance goal that is expressed objectively and quantifiably and does not require additional measures is considered self-measuring.

OCC's performance plan has at least one annual performance goal and measure for each strategic goal. However, the plan does not provide a succinct and concrete picture of expected performance for use in subsequent comparisons with actual performance. The plan's format could be revised to more clearly disclose to readers OCC's performance goals and what specific annual activities are expected. The present format is a varied array of strategic goals, strategic objectives, descriptions of strategic objectives, performance goals, and measures that can be confusing to a reader.

OCC officials agreed that the performance plan format is confusing, noting that a contributing factor is the Department of the Treasury's standard format for its bureaus that OCC officials believed they needed to use in preparing the performance plan. We contacted a Treasury official who indicated that the standard format can be modified to meet the individual needs of each bureau. It seems likely that OCC could adapt the standard format to make its plan more responsive to OCC's needs and the needs of other users. In addition, OCC officials said that the plan left out explanatory details because OCC staff who prepared and approved the plan were familiar with agency goals, objectives, and data requirements. The result, officials agreed, might be that other OCC staff, such as examiners, or external decisionmakers, such as Congress, would not completely understand the plan.

In addition, as previously mentioned, the Results Act defines a performance goal as an intended level of performance that is expressed as a tangible, measurable objective against which actual achievement can be compared, and includes goals expressed as a quantitative standard, value, or rate. However, 11 of OCC's 12 performance goals are not stated in measurable terms that meet this definition. For example, for the performance goal "continue the regulatory reinvention process to improve efficiency and reduce unnecessary burden," OCC does not define "improve efficiency" or "reduce unnecessary burden." Moreover, this performance goal does not state what is to be accomplished during the year through the regulatory reinvention process.

For the 10 performance goals that have a single measure designated for each goal, OCC might consider converting the measures into self-measuring performance goals. For example, the single performance measure for the performance goal of ensuring that internal mission-critical OCC systems are Year 2000 compliant could be converted to a performance goal addressing the percentage of OCC systems that are to be made

Year 2000 compliant. For the two performance goals that have more than one measure, such as the goal of supporting efforts to foster a national bank charter, OCC might also make these goals self-measuring or, if more than one measure is needed, link the measures to a tangible, measurable objective.

The OCC plan could also be improved in the area of performance measure targets. The plan provides ~~1998~~ targets for many, but not all, performance measures. For example, the plan lacks performance ~~targets~~ for three performance measures for the performance goal of having national banks meeting housing and other financial service needs. Also, even though relevant historical data are available for five of the measures without targets, the OCC plan does not set a 1998 target for them. For example, OCC has historical data for 1995 and 1996 on home mortgage loans to low- and moderate-income persons and areas and on the amount of community development investment by national banks, but OCC did not set targets for 1998 in the performance plan. OCC recently developed 1998 targets that could be used to update the performance plan.

Also, the plan could better define appropriate measures for capturing performance for many of OCC's performance goals. Eight of the 15 measures either do not appear to measure the related performance goals or they only partially measure them. For example, the plan provides measures that do not adequately capture performance for one goal to support efforts fostering a national bank charter that will effectively compete with other financial service providers and continue to meet the financial service needs of all types of customers. The two measures the plan provides for this goal do not capture activities that relate to fostering a national bank charter. For example, one measure is "the average processing time for analysis of customer complaints," which measures an activity that is only marginally related to fostering a national bank charter. The measure for the performance goal of conducting examinations is the percentage of examinations started on schedule, which again does not fully capture the range of activities in conducting scheduled examinations.

In addition, some measures, even though related to a performance goal, may have limitations that preclude the measures from accurately capturing intended performance. For example, a measure for the performance goal to improve internal operational efficiency and reduce burden is to compare national bank assessments to national bank overhead expenses. Although bank overhead expenses relate to operational efficiency, they could increase or decrease significantly due to factors unrelated to OCC bank assessments and fees and, thus, bias the result of this measure.

Lastly, some of the performance measures provide useful information for gauging OCC's progress toward outcomes, or results, such as the measures of OCC systems' Year 2000 compliance. However, 11 of the 15 performance measures in the plan are output- or process-oriented, such as the percentage of examinations started on

schedule or the percentage of time meeting the application processing time frames. The reliance on output- or process-oriented measures instead of those assessing outcomes is a problem common within the federal government and, in particular, for regulatory agencies where it can be difficult to relate activities to specific outcomes. However, OCC may want to make a greater effort to identify and use annual outcome goals to reflect the true results of its activities. This is particularly important for OCC's core activities, such as bank supervision, that directly support OCC's mission.

### Connecting Mission, Goals, and Activities

The Results Act and its guidance expect a clear relationship to exist between an agency's long-term strategic goals and mission and the performance goals in the annual performance plan. Performance goals should also cover each program activity in the agency's budget. The OCC plan has performance goals that attempt to reflect OCC's strategic goals and mission and that cover all program activities in the agency's budget. However, the plan's performance goals do not completely address OCC's strategic goals.

Specifically, OCC's performance goals do not match the annual objectives that OCC has developed to carry out its strategic goals. Performance goals and related measures for 1998 in the performance plan are not linked to either the 1997 objectives provided in OCC's 1997-2002 strategic plan or the four 1998 objectives in the performance plan itself. Instead of linking performance goals to these annual objectives, the plan links the goals to one or more strategic goals, making it difficult to compare annual performance goals with annual objectives and then with each strategic goal.

OCC officials explained that OCC's calendar year objectives were better characterized as efforts to be achieved over a 2- to 3-year period. However, multiyear objectives can skew annual outcomes. If annual objectives change from year to year, as they have from 1997 to 1998, and they are not matched to annual Results Act performance goals, it will be difficult to determine if the activities ultimately result in performance improvement. If OCC continues this approach, the agency may have to issue a complex report linking strategic goals, different objectives, and performance goals to meet the intent of the Results Act.

The performance plan describes specific efforts under each of the four 1998 objectives. These efforts might serve as the basis for developing stronger performance goal statements. Although the 1998 objectives appear to be more like long-term strategic goals, the specific efforts described for each objective provide a starting point for annual performance goals. For example, to strengthen bank supervision, the performance plan discusses OCC efforts that would (1) use the OCC supervisory

process to promote and require banks to follow sound risk management fundamentals, (2) continue to refine techniques for quantifying and responding to bank and systemwide risk, and (3) take timely and effective action with institutions characterized as high-risk outliers. These efforts could serve as a basis for detailed annual performance goals.

Lastly, performance goals could be improved by more directly addressing OCC's four strategic goals. The first strategic goal, ensuring bank safety and soundness, has performance goals that more fully address the strategic goal's intent than the other three strategic goals. For example, the performance goal to "ensure compliance with applicable laws and regulations through compliance examinations" is not clearly linked to its strategic goal of ensuring fair access to financial services for all Americans. The performance goal and its measure, which is the percentage of national banks receiving compliance examinations, identify the number of compliance examinations completed, not how the examinations might result in fair access. OCC officials pointed out that the agency has and uses a wide range of data and measures to set goals and track performance and agreed that these should be incorporated into its Results Act plans and performance reports.

#### Recognizing Crosscutting Efforts

Results Act guidance states that an agency's performance plan should identify those performance goals that are being mutually undertaken in support of programs or activities of an interagency, crosscutting nature.<sup>4</sup>

OCC's performance plan partially addresses the need to coordinate with other financial regulatory agencies. The OCC plan states that the agency participates in the Results Act Banking Regulatory Working Group, which is to coordinate strategic planning activities and, if possible, develop crosscutting goals and measures.<sup>5</sup> OCC

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<sup>4</sup>OMB's July 1, 1998, Circular A-11 guidance states that at a minimum, the annual plan should indicate those programs or activities that are being undertaken with other agencies to achieve a common purpose or objective. An agency should also review the fiscal year 1999 performance plans of other agencies with which it participates in a crosscutting program or activity to ensure that goals and indicators for a crosscutting program are consistent and harmonious.

<sup>5</sup>The Results Act Banking Regulatory Working Group is made up of representatives from the Federal Reserve, the Federal Deposit Insurance Corporation, the Office of Thrift Supervision, the National Credit Union Administration, and OCC. These regulators also are involved with the crosscutting efforts of the Federal Financial Institutions Examination Council.



officials said that the working group is in the process of developing common policies and measures, where appropriate, and developing crosscutting goals and measures, where possible. However, the crosscutting efforts of the working group described in the performance plan and by OCC officials during our interviews were limited to exploring ways to develop common processes and criteria for improving individual agency efforts. Although this is a necessary first step, Results Act guidance encourages agencies to develop common performance goals and measures for related programs. These goals and measures should address broader overlapping regulatory issues, such as federal bank oversight system inconsistencies in examination policies and practices and enforcement actions identified in our earlier work.<sup>6</sup> For example, a performance goal could be that OCC will remove identified inconsistencies in joint examinations within a certain time period. OCC officials noted that they also work cooperatively with other federal banking agencies through the Federal Financial Institutions Examination Council. However, this cooperation is not mentioned in the plan as an interagency effort.

OCC'S PERFORMANCE PLAN SHOULD DISCUSS HOW STRATEGIES AND RESOURCES WILL HELP ACHIEVE OCC GOALS

The Results Act requires that the annual performance plans describe the strategies and resources the agency intends to use to achieve its performance goals. Typically, strategies cover the agency's operational processes, skills, and technologies that it intends to use to achieve program goals. Resources cover capital, human, financial, and other resources. The OCC performance plan has a section covering operational processes, skills, revenue, and technologies but does not discuss individual strategies for each performance goal. In addition, the plan briefly describes such resources as staffing and revenue to achieve the performance, but these resources also are not identified by performance goal.

Connecting Strategies to Results

The Results Act and guidance require that the performance plan briefly describe the agency's strategies to accomplish its performance goals. The OCC performance plan needs a fuller discussion of the strategies needed to achieve its intended performance goals. For example, performance goal statements in the plan include a general reference to approaches, such as reinvention or a quality assurance process, but do not provide detailed strategies for carrying out these approaches. Instead of developing individual strategies for each performance goal, the plan relies on limited

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<sup>6</sup>See Bank and Thrift Examinations: Adoption of Risk-Focused Examination Strategies (GAO/T-GGD-98-13, Oct. 8, 1997).

general information in performance goal statements or contextual or explanatory data that are summarized for several performance goals. Furthermore, the limited contextual or explanatory data for the performance goals generally do not explicitly discuss specific activities, administrative processes, or the application of technology.

In addition, although the Results Act does not require that the performance plan specifically discuss the impact of external factors on achieving performance goals, we believe a discussion of such factors would provide additional context regarding anticipated OCC performance.<sup>7</sup> The performance plan does not directly mention or address the strategic plan's external factors, such as industry consolidation, pending legislation, and the changing competitive environment. OCC officials explained they were cautious in making public statements about external factors concerning the banking industry since that was a policy role for which other agencies are responsible. Nonetheless, the plan could properly discuss how external factors may or may not impact specific performance goals.

#### Connecting Resources to Strategies

The Results Act requires that the annual performance plan briefly describe the capital, human, financial, and other resources being applied to achieve the performance goals. OCC's performance plan partially discusses the resources OCC will use to achieve its goals. The plan briefly discusses revenue sources and the 1997 budgeting of 3,086 full-time equivalent positions and \$353 million to carry out OCC's responsibilities. How these numbers relate to 1998 strategies and performance goals is not explained. The plan provides more details on how current information technology strategies and investment projects support three 1997 OCC objectives, but this is not done for 1998 objectives or performance goals. Without more specific 1998 resource information, it is not clear what resources are available to accomplish the expected level of performance.

#### OCC'S PERFORMANCE PLAN SHOULD PROVIDE SUFFICIENT CONFIDENCE THAT PERFORMANCE INFORMATION WILL BE CREDIBLE

To be able to assess progress toward the achievement of performance goals, the measures used must be valid and reliable. Reliability refers to the precision with which performance is measured, while validity is the extent to which the measure adequately represents actual performance. Results Act guidance states that the performance plan should describe credible procedures to verify and validate the measured values of actual performance. The plan should also identify significant data

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<sup>7</sup>See GAO/GGD-10.1.20.

limitations and discuss how they or other factors affect the credibility of performance information. OCC's performance plan provides some information on what means will be used to verify and validate the measures and their values, but the information is not specific or focused on individual measures. In addition, data limitations are not addressed in the plan.

#### Verifying and Validating Performance

Results Act guidance states that the plan should describe credible procedures to verify and validate the measured values of actual performance. OCC's performance plan provides limited information on how the agency will ensure that performance information derived from measures will be sufficiently complete, accurate, and consistent. The plan provides a list of actions, such as using internal edit checks or external audits and reviews. However, actions to verify or validate individual measures are not specified, nor is it stated when the audits and reviews would be conducted. OCC officials said that an internal agency quality assurance group is validating information from external sources and that they also recognized the need to verify or validate internal operational data.

#### Recognizing Data Limitations

The Results Act guidance states that, as appropriate, the plan should identify and describe in sufficient detail (1) the specific performance data required and (2) the means for collecting, maintaining, and analyzing these data to allow an assessment of their credibility. OCC's performance plan would be more useful if it identified or discussed significant data limitations from agency or external sources, such as national banks, the limitations' significance, and steps being taken or proposed to address these limitations. These data limitations might include inconsistencies from location to location, from one time period to another, or from one data source to another when data from more than one source must be combined to create a measure.

#### AGENCY COMMENTS AND OUR EVALUATION

We provided OCC officials with a draft of our letter and met with them on July 14, 1998, to discuss our observations and to obtain their comments. We also provided a draft of this letter to and received comments from the Senior Deputy Controller for Administration and Chief Financial Officer. The officials generally agreed with our observations and noted that the OCC's Acting Comptroller had also pointed out similar problems with the plan. They noted that OCC is now in the process of better integrating its planning and budgeting process, which they believe will improve later plans. OCC officials also said that the agency is in the process of changing most of its strategic and performance planning activities to better focus on outcomes. Overall,

they described OCC as devoting a considerable amount of effort to meeting Results Act expectations.

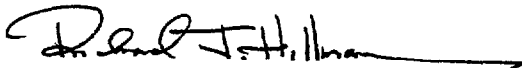
The OCC officials also provided specific comments on three points in the draft letter. They believed that we should provide more information on the challenge and complexity of implementing the Results Act. We added additional language in this letter to recognize the challenges of implementing the Act. Regarding crosscutting efforts with other financial regulatory agencies, OCC officials believed that a specific performance goal may not be needed to address common regulatory purposes because OCC is an active participant with the other agencies in these efforts. We reiterated to the officials the Results Act guidance requires that the plan reflect effective crosscutting action. Furthermore, where agencies were endeavoring to improve crosscutting efforts, it would be reasonable to expect to find goals in the annual plan that would meet the requirement of the Results Act guidance.

Lastly, OCC officials said they recognized that the plan must better describe strategies and resources. However, the officials said that the agency currently does not have adequate capability to track resources by performance goal and that the agency is in the process of determining the action required to correct this. Consistent with the Results Act, we encouraged the OCC officials to develop the necessary capability to track resources by performance goal.

We are sending copies of this letter to the Chairman and Ranking Minority Member of the House Committee on Banking and Financial Services and the Director, Office of Management and Budget. We will also make copies available to others on request.

This letter was prepared under the direction of Kane Wong, Assistant Director. Other major contributors are listed in the enclosure. Please contact me at (202) 512-8678 or Mr. Wong at (415) 904-2123 if you or your staff have any questions.

Sincerely yours,



Richard J. Hillman  
Associate Director, Financial Institutions  
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## RELATED GAO PRODUCTS

Results Act: Observations on Treasury's Fiscal Year 1999 Annual Performance Plan  
(GAO/GGD-98-149, June 30, 1998).

Managing for Results: Experiences of Selected Audit Programs (GAO/GGD-98-41, Feb. 19, 1998).

The Results Act: Observations on Draft Strategic Plans of Five Financial Regulatory Agencies (GAO/T-GGD-97-164, July 29, 1997).

Managing for Results: Regulatory Agencies Identified Significant Barriers to Focusing on Results (GAO/GGD-97-83, June 24, 1997).

Managing for Results: Analytic Challenges in Measuring Performance  
(GAO/HEHS/GGD-97-138, May 30, 1997).

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