

# RESCINDED

EC - 264

## EXAMINING ISSUANCE

Comptroller of the Currency  
Administrator of National Banks

Type: Examining Circular

Subject: Data Collection for Small Business  
Loan Documentation

Any attachments to this document are rescinded only as they relate to national banks and federal savings associations.

TO: Deputy Comptrollers, District Administrators, Department and Division Heads, and All Examining Personnel

### PURPOSE

This issuance establishes a program to collect data on loans that banks identify for exemption from unnecessary documentation under the Interagency Policy Statement on Documentation for Loans to Small- and Medium-sized Businesses and Farms.

### REFERENCES

This issuance should be read in conjunction with Banking Bulletin 93-18 (Interagency Policy on Small Business Loan Documentation) dated April 2, 1993 and SMS Technical Bulletin 93-1 (attached).

### BACKGROUND

The Interagency Policy Statement allows highly rated and well- or adequately capitalized institutions to identify an "exempt portion" of their small- and medium-sized business and farm loan portfolios. Those loans will be evaluated solely on performance and will be exempt from examiner criticism of documentation. The OCC must monitor how qualifying institutions implement the provisions of the Interagency Policy Statement and how those institutions and the "exempt portion" loans perform.

This issuance establishes a monitoring program that will collect data during examinations and record it in the Supervisory Monitoring System (SMS). Examiners should enter the following data on the Asset Statistics record in the Supervisory Data application of SMS:

- ① Number of loans in the "exempt portion,"
- ② Total dollar amount of loans in the "exempt portion," and
- ③ Total dollar amount of loans in the "exempt portion" that are past due.



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## DATA COLLECTION REQUIREMENTS

Effective immediately, the OCC will commence collecting this data on the "exempt portion" of the small- and medium-sized business and farm loan portfolios. Examiners should collect the data during the next examination or periodic financial review if it is readily available. The data must be updated at each subsequent examination, but no less frequently than once each year at the full scope, on-site examination.

## ORIGINATING OFFICE

For additional guidance on collecting this data, contact the Office of the Chief National Bank Examiner in Washington, D.C. (202) 874-5170.

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## Related Links

- [SMS Technical Bulletin 93-1](#)

