



TEXAS OFFICE OF CONSUMER
CREDIT COMMISSIONER

**Fostering a fair, lawful, and healthy
credit environment for Texas.**

STRATEGIC PLAN

Fiscal Years 2021 - 2025

June 1, 2020
occc.texas.gov

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AGENCY STRATEGIC PLAN
Fiscal Years 2021 to 2025
By
Office of Consumer Credit Commissioner

FINANCE COMMISSION OF TEXAS		
COMMISSION MEMBER	DATES OF TERM	HOMETOWN
Phillip A. Holt, Chair	Feb 23, 2016 to Feb 1, 2022	Bonham
Robin Armstrong, M.D.	Apr 2, 2019 to Feb 1, 2022	Friendswood
Robert (Bob) Borochoff	Feb 22, 2016 to Feb 1, 2022	Houston
Hector J. Cerna	Dec 16, 2015 to Feb 1, 2026	Eagle Pass
Margaret (Molly) Curl	Feb 23, 2016 to Feb 1, 2022	Richardson
Larry Long	Apr 6, 2020 to Feb 1, 2026	Dallas
William M. (Will) Lucas	Sep 27, 2011 to Feb 1, 2024	Center
George "Cliff" McCauley	Jun 28, 2018 to Feb 1, 2024	San Antonio
Sharon McCormick	Apr 20, 2020 to Feb 1, 2026	Frisco
Vince E. Puente, Sr.	Feb 2, 2012 to Feb 1, 2024	Ft. Worth
Laura Nassri Warren	Apr 20, 2020 to Feb 1, 2026	Palmhurst

JUNE 1, 2020

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OFFICE OF CONSUMER CREDIT COMMISSIONER (OCCC) MISSION

The mission of the Office of Consumer Credit Commissioner (OCCC) is to regulate nonbank financial services and to educate consumers and industry providers, fostering a fair, lawful, and healthy financial services market that grows economic prosperity for all Texans.

AGENCY GOALS & ACTION PLANS

The OCCC promotes the highest principles of professional conduct and ethics, diversity, and stewardship and conservation of funds while engaging in limited, balanced, and effective regulation.

The OCCC licenses and regulates non-depository financial service providers using the following four-part philosophy:

- **Regulate** fairly, efficiently, and effectively, balancing the needs of both consumers and financial service providers by enforcing Texas credit laws and licensing qualified financial service providers;
- **Educate** consumers about rights, responsibilities, and remedies; and financial service providers about rights and responsibilities;
- **Communicate** collaboratively with and encourage communication among the financial services industry, consumer public, and the OCCC; and
- **Protect** and safeguard consumers against abusive, unfair, and deceptive lending practices.

GOAL A: Consumer Protection

Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.

Actions Required to Achieve Goal

- Investigate, process, and respond to complaints against OCCC-regulated financial service providers, in a professional, appropriate, and timely manner.
- Identify problem financial service providers and industry practices and advise service providers and consumers of their rights, remedies, and responsibilities.
- Examine and investigate regulated entities to ensure compliance with appropriate statutes and regulations.
- Evaluate examination priorities using risk assessment methodologies to ensure optimal resource allocation.
- Issue examination reports that direct regulated entities to correct violations and make restitution to bring transactions and practices into compliance.
- Maintain and foster partnerships with state and federal regulatory counterparts to facilitate networked enforcement.
- Initiate and timely resolve administrative enforcement actions against regulated businesses that commit violations.

- Engage in opportunities to encourage compliance through attendance at industry-related events, and publication of compliance aids and tools.
- Develop and refine regulatory policy and administrative rules using a transparent and participatory process.
- Amplify training programs and routines to maintain high-quality consumer protection personnel including improved retention strategies and a career ladder program.

Support of Statewide Objectives

1. Accountable to tax and fee payers of Texas.

- Foster a fair, lawful, and healthy financial services market through consumer protection strategies that provide public confidence in the market.
- Provide consumers with user-friendly, accessible options for filing complaints against regulated entities.
- Ensure licensees and registrants have access to compliance guidance on OCCC website.
- Ensure regulatory costs are reasonable and equitable across regulated industries.
- Ensure adherence with self-leveling, self-funding and Self-Directed, Semi-Independent (SDSI) statutory requirements.

2. Efficient such that maximum results are produced with a minimum waste of taxpayer funds, including through the elimination of redundant and non-core functions.

- Streamline operations and improve processes when needed.
- Implement technology improvements to provide enhanced efficiency for staff operation and greater self-service and transparency for public users.
- Share information and collaborate with other regulators to minimize regulatory burden.

3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.

- Use a risk-profiling methodology for examination selection to focus limited resources in areas that indicate the greatest potential for noncompliance.
- Reevaluate and adjust performance measures and targets to meet the needs of the agency and its stakeholders.

4. Attentive to providing excellent customer service.

- Handle consumer complaints in a professional and timely manner.
- Continue to offer various avenues in which a consumer may contact the OCCC.
- Provide extensive selection of consumer related information on the OCCC's website.
- Provide training opportunities to staff on customer service.
- Improve communications outreach to stakeholders.
- Seek feedback from stakeholders through a customer service survey.

5. Transparent such that agency actions can be understood by any Texan.

- Seek input to improve the agency's services.
- Ensure that the agency's website contains information related to licensee or registrant's specific industry (e.g., proposed rule changes).
- Hold stakeholder meetings to discuss rules and legislative changes.

Other Considerations

Consumer Protection through Complaint Resolution

The OCCC's Consumer Assistance staff answers questions and assists Texans in resolving issues against regulated financial service providers. Individuals can contact the Consumer Assistance team by calling the helpline, sending an email, sending a written complaint by fax or mail, or filing a complaint through the OCCC's online portal, ALECS. Assistance is provided on a variety of topics – from education about specific characteristics of a financial transaction to complaint resolution. The Consumer Assistance team works with the individual and the financial service provider to come to a reasonable resolution. The OCCC redirects inquiries that are outside its jurisdiction and refers unresolved matters to the OCCC's investigation and legal areas when additional information or action is needed.

The Consumer Assistance team handles a high volume of calls and complaints. The charts below highlight the activities of this area in 2018 and 2019.

CONSUMER COMPLAINTS CLOSED BY TYPE:

Type	FY 2018 Number Processed	% of Total	FY 2019 Number Processed	% of Total
Motor Vehicle Sales Finance	1074	60.7%	1073	61.8%
Regulated Loans - Non Real Estate	208	11.8%	144	8.3%
Pawnshop	183	10.4%	116	6.7%
Credit Access Business - Payday Loans	114	6.4%	97	5.6%
Credit Access Business - Auto Title Loans	85	4.8%	59	3.4%
Registered Creditor	67	3.8%	40	2.3%
Property Tax Loans	12	0.7%	18	1.0%
Manufactured Housing	7	0.4%	16	0.9%
Secondary Mortgages & Home Equity	6	0.3%	1	0.1%
Crafted Precious Metals Dealers	0	0.0%	3	0.2%
Debt Management/Debt Settlement	0	0.0%	3	0.2%
Other	12	0.7%	4	0.2%
Non-Jurisdictional	0	0.0%	163	9.4%
Total Complaints	1768	100.0%	1737	100.0%

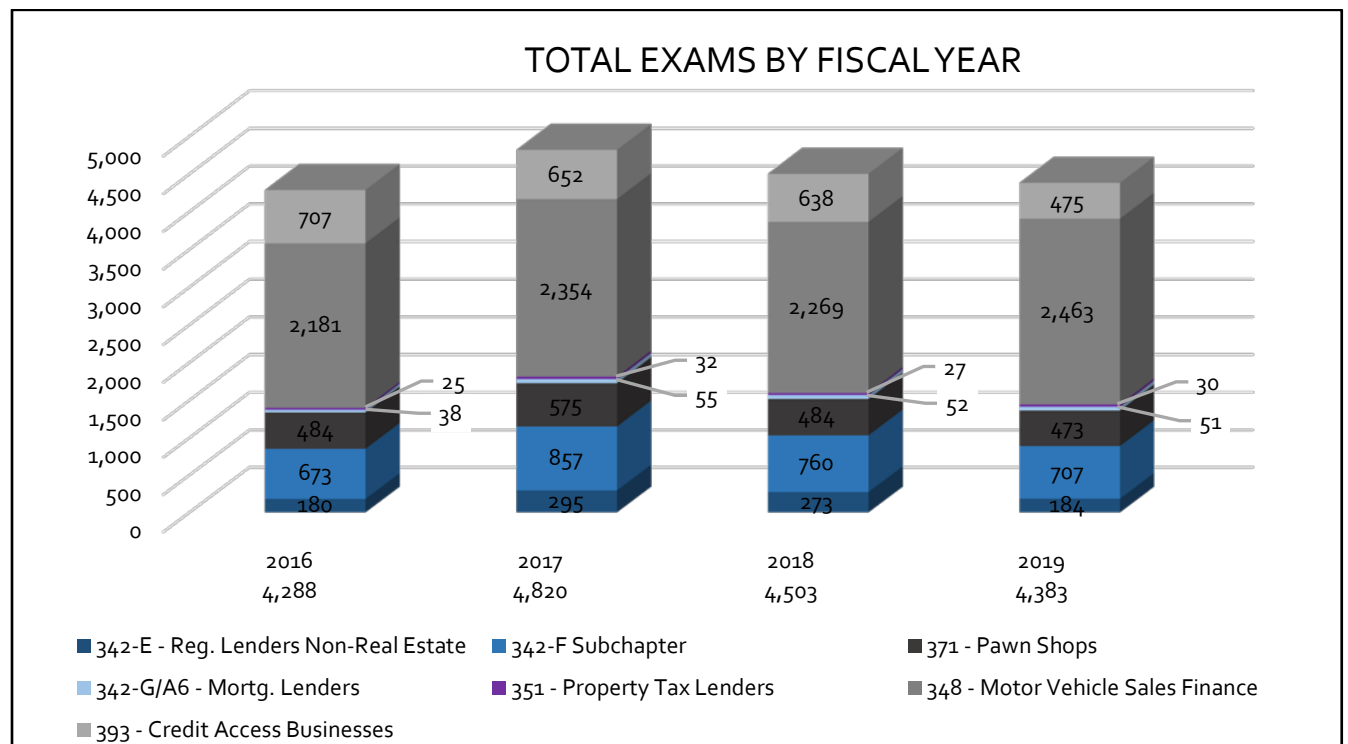
"Other" includes refund anticipation loans, credit card surcharges, and complaints believed to be the agency jurisdiction where it was later determined the issue should be referred to the appropriate authority. As a subset of "Other", the agency began tracking "Non-Jurisdictional" complaints in FY '19. This category includes complaints received by the department wherein the agency does not have regulatory authority so the issue was referred to the appropriate authority.

In order to maintain the volume of calls and complaints, and provide a high level of customer service, the OCCC is committed to growing knowledgeable and professional Consumer Assistance team members. The OCCC is continuing to look for new ways to enhance its technology to improve efficiencies.

Consumer Protection through Examination and Investigation

The OCCC examines licensed financial service providers to ensure legal compliance, engages in complaint-based investigations of registered creditors, crafted precious metals dealers, debt management service providers, refund anticipation loan facilitators, and manufactured housing creditors, and investigates businesses suspected of engaging in regulated activity without the proper license or registration. The comprehensive examination program encompasses motor vehicle sales finance, regulated lending (including home equity and secondary mortgages), credit access businesses, pawnshops, and property tax lenders. More than \$53 million in restitution has been returned to Texans as a result of OCCC action since 2016.

The chart below represents a four-fiscal-year comparison of examinations by industry. Motor vehicle sales finance licensees have the most exams performed due to their dominant size of the industries regulated.



The OCCC has implemented an enterprise-level examination scenario allowing examiners to conduct certain exams from one primary location. This scenario is not suited for all license types or situations, but has been effective and efficient when applied. As a result, the OCCC has made progress towards conserving travel expenses and streamlining the examination process.

Further improvement to the examination process includes risk profile modeling to assess the level of compliance risk among the licensed industry group. Assessing compliance risk with a consistent and routine methodology allows the allocation of examiner resources in the most effective manner. Moving forward, the agency will be increasing the scoping of examinations to include compliance management systems with a focus on management reviews, including policies and procedures and the use of data analytics.

Because of the COVID-19 outbreak, significant uncertainty and challenges face the economy, including the financial services market. The OCCC has issued advisory bulletins urging lenders to work with borrowers during this crisis, and to be practical, flexible, and empathetic. Regulated financial service providers have responded positively to borrowers' needs. Efforts to work with borrowers can contribute to the health and recovery of communities under stress. These efforts serve the long-term interests of both borrowers and lenders, provided the efforts are performed in a reasonable manner with proper controls and management oversight. The OCCC understands that regulated financial services providers need regulatory flexibility in light of staffing priorities and disruptions caused by COVID-19. The OCCC will continue to pursue practical and adaptive solutions in reviewing industry activities during this crisis and the following recovery.

The OCCC will also need to adapt to the regulatory uncertainty that results from a changing technological landscape. Innovations in financial technology (FinTech) can enhance customer service and make products more accessible. However, there is regulatory uncertainty about whether some FinTech products are subject to the same consumer protections that have traditionally applies to loans in Texas. These products include wage-access transactions, income-share agreements, and transactions offered through a bank partnership. In its regulatory supervision, the OCCC must adapt to these challenges and remain flexible, while vetting emerging offerings to ensure compliance and consumer protection.

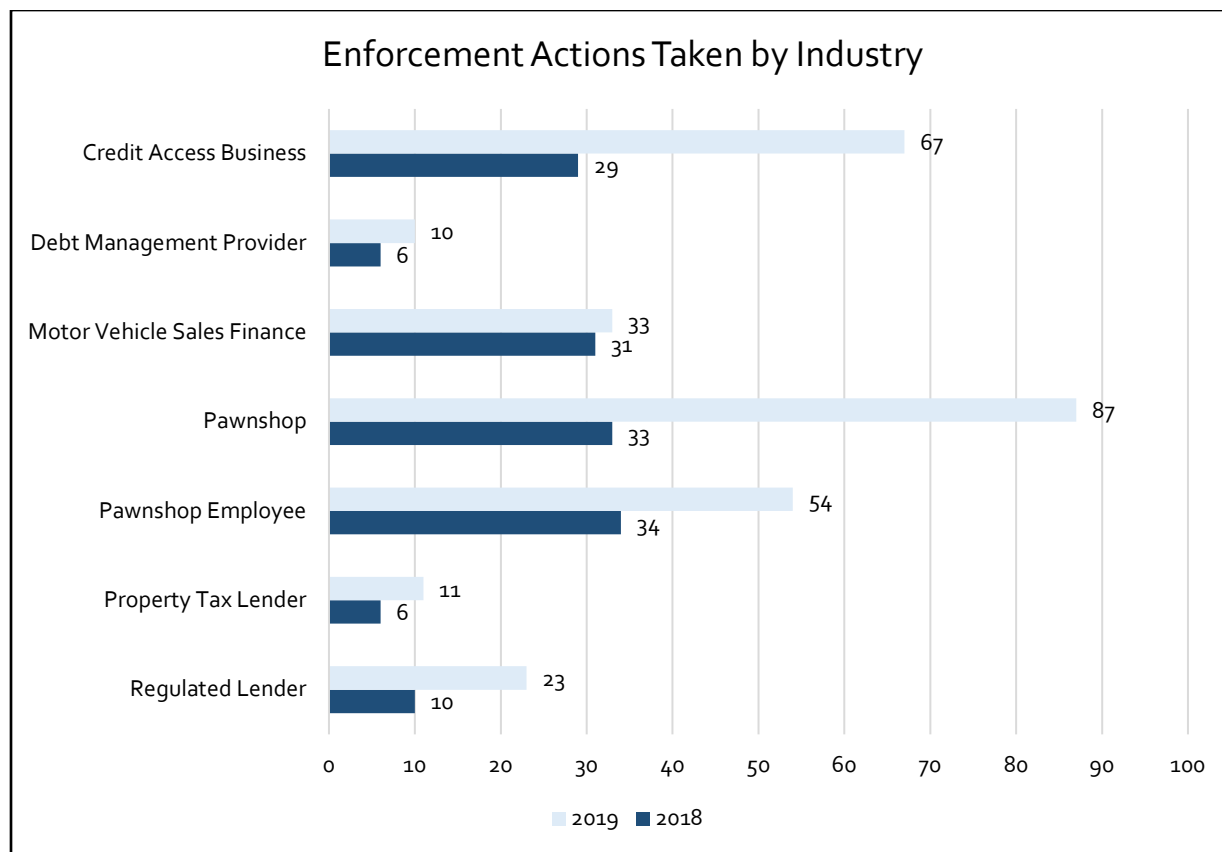
The agency actively engages in networked enforcement through collaboration with its regulatory counterparts. This includes participation with multistate workgroups to develop standardized consumer credit product examination tools and practices, as well as standardized consumer complaint protocols and data collection methodologies. In these workgroups, the Conference of State Bank Supervisors (CSBS) coordinates input and participation by non-depository state regulators. The OCCC has served as Examiner in Charge for multiple of these multistate examinations. CSBS also assists state regulators with coordinated communication with the Consumer Financial Protection Bureau (CFPB) regarding the CFPB's policy, rulemaking, and coordinated examination scheduling. Two agency staff members serve on a joint Auto Finance Committee where their activities include, examination report reviews, testing of findings, and consulting support. The OCCC expects these activities to continue and expand.

The OCCC expanded its online portal, ALECS, over the past several years to include workflows and functionality to manage examination and investigation processes. The agency continues to work to improve this system.

The OCCC continues to make professional growth and career advancement opportunities available for its examination and investigation staff. Significant resources are expended to train field staff members and retention of these team members is a priority. In addition to knowledge of financial regulation, staff members will need to continue to develop new technological skills to keep pace with the changing financial services industry.

Consumer Protection through Administrative Enforcement and Compliance Tools

The OCCC's legal team supports consumer protection by initiating administrative enforcement actions against businesses that commit violations, and engaging in activities to encourage compliance. Cases are referred to the legal team for action by the Consumer Assistance, Examination, Investigation, and Licensing areas. The OCCC promotes compliance using a graduated sanctions strategy that increases penalties for repeat violators. The chart below provides a snapshot of enforcement activities in fiscal years 2018 and 2019.



The legal team also supports regulated industries by responding to requests for advice, issuing advisory bulletins, hosting and attending stakeholder events, and drafting and reviewing agency rules. The

complex interaction between state and federal law, and rapid changes to the financial services industry, present a challenge to agency legal staff. Team members will need to continue to react quickly to legal and technological changes, and look for opportunities to expand and improve individual technical literacy.

GOAL B: Effective Licensing & Registration

Provide a high quality and efficient licensing and registration process that maintains high standards for licensed or registered financial service providers and promotes a transparent, fair, and competitive financial services market.

Actions Required to Achieve Goal

- Investigate and process license and registration applications in a professional, appropriate, and timely manner.
- Ensure applicants demonstrate the appropriate fitness and eligibility requirements for licensure or registration by the OCCC, including review of background checks as appropriate (and as statutory authority allows).
- Maintain a manageable volume of pending license applications.
- Analyze all facets of the application and renewal processes to ensure efficiency, integrity, and data necessity.
- Assist in the maintenance and improvement of the OCCC's online portal, ALECS, to facilitate internal efficiency and usefulness for external users.
- Foster productive communication with applicants, licensees, stakeholders, and trade groups.
- Provide education, instructions, and support to applicants through the OCCC website and other communication tools.
- Provide professional development opportunities to licensing staff, maintain appropriate staffing levels, and ensure appropriate tools and resources are available to allow staff to perform at the highest level.

Support of Statewide Objectives

1. Accountable to tax and fee payers of Texas.

- License and register entities and individuals with appropriate knowledge, experience, and fitness to provide lawful and fair financial services.
- Maintain integrity within the financial services industry by preventing unqualified applicants from receiving licenses or registrations.
- Provide clear, accurate information to the public in a timely manner.
- Ensure license and registration fees are adequate to support the mission of the OCCC while limiting the burden on industry.
- Ensure adherence with self-leveling, self-funding and Self-Directed, Semi-Independent (SDSI) statutory requirements.

2. Efficient such that maximum results are produced with a minimum waste of taxpayer funds, including through the elimination of redundant and non-core functions.

- Streamline operations and improve processes when needed.
- Implement technology improvements to provide enhanced efficiency for staff operation and greater self-service and transparency for public users.
- Maintain staffing resources and levels to properly support workload needs and maximize output.

3. **Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.**
 - Maintain a prioritized focus on processing license applications and renewals.
 - Monitor application processing times to ensure acceptable service levels.
 - Reevaluate and adjust performance measures and targets to meet the needs to the agency and its stakeholders.
4. **Attentive to providing excellent customer service**
 - Handle inquiries in a professional and timely manner.
 - Provide resources via the OCCC website and other technologies that put information in the hands of the public.
 - Improve staff communication skills and abilities through professional development.
 - Process applications quickly and efficiently.
 - Seek feedback from applicants, licensees, and registrants through a customer service survey.
5. **Transparent such that agency actions can be understood by any Texan.**
 - Seek input to improve the agency's services.
 - Communicate the application and renewal processes clearly in written instructions and verbally.
 - Provide a real-time status throughout the application process and timely and informative responses to inquiries.

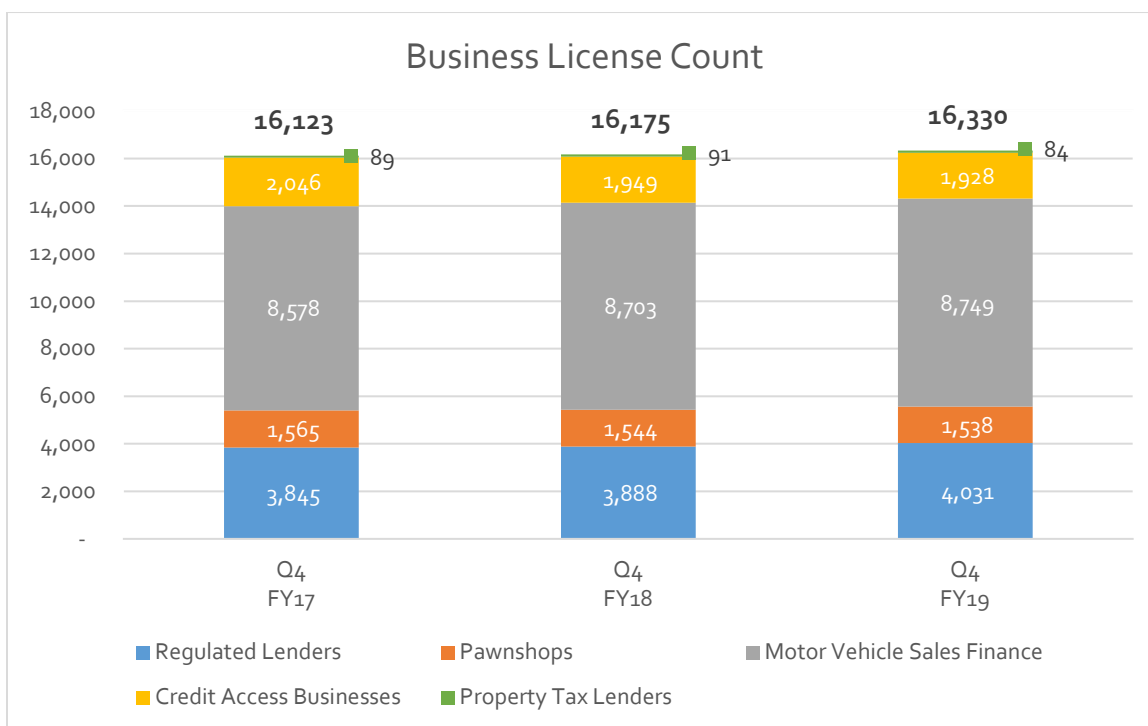
Other Considerations

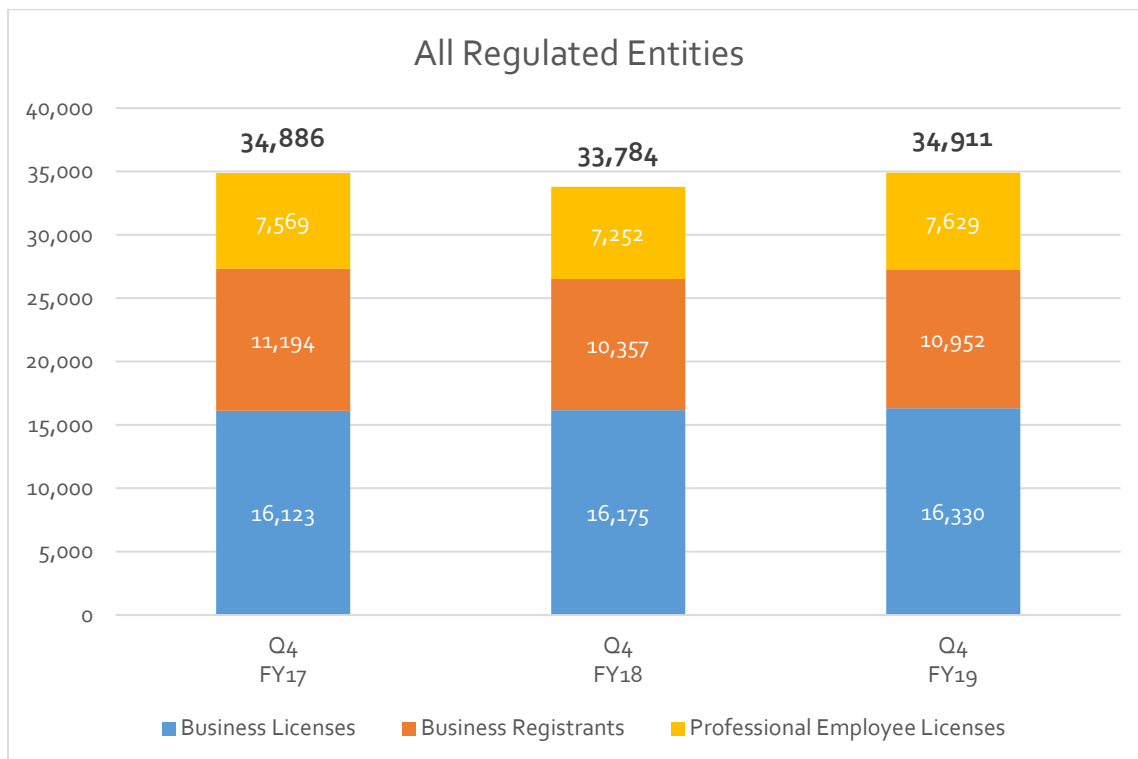
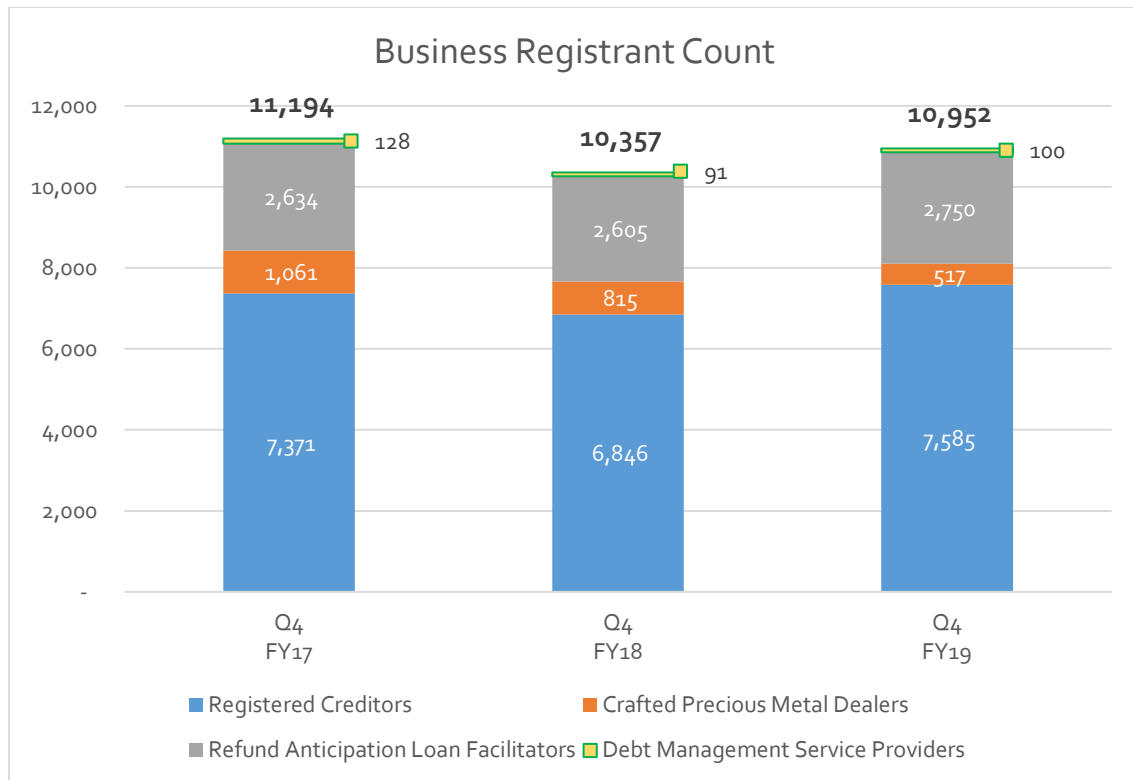
A large part of the OCCC's regulatory activity involves licensing and registering financial service providers. The OCCC licenses regulated lenders, motor vehicle sales finance dealers, commercial motor vehicle sales finance dealers, credit access businesses, property tax lenders, and pawnshops. Debt management service providers, crafted precious metals dealers, refund anticipation loan facilitators, and registered creditors must register with the OCCC. Residential mortgage loan originators and certain pawnshop employees must be individually licensed. The license and registration process varies slightly between the industries, but generally, applicants submit an application through the OCCC's online portal, ALECS. Licensing staff review the application, and communicate with the applicant to ensure all required information is provided. Any required fingerprint-based background checks are initiated by the applicant through a third party, and the results are share electronically with the OCCC. In addition to reviewing and processing applications, the licensing team handles a large volume of calls and provides information and assistance.

The rapidly changing technological landscape is removing borders as the financial services industry moves toward a more digital marketplace. The OCCC anticipates increased interest in the notion of nationwide networked supervision, and the Nationwide Multistate Licensing System & Registry (NMLS) presents opportunities to support collaboration among state and federal regulators. The residential mortgage loan originators licensed with the OCCC do so through the NMLS system. Changes in

regulation also impacts the licensing area. For example, beginning September 1, 2019, licensing of pawnshop employees became optional.

The OCCC's license and registration population has maintained a stable growth pattern over the past several years, although specific industries experienced isolated declines and adjustments. Due to the COVID-19 outbreak, all industries will be experiencing adjustments and a potential slight decline as the financial service market responds to the increased level of delinquencies and pursues efforts to recover. The following charts reflect the number of OCCC regulated entities at the end of each quarter in fiscal years 2017, 2018, and 2019.





GOAL C: Financial Education

Educate consumers about their rights, remedies, and responsibilities and encourage communication and cooperation among the nonbank financial services industry, the consumer public, and the agency. Promote the Texas Financial Education Endowment (TFEE) to support statewide financial capability and consumer credit building activities and programs.

Actions Required to Achieve Goal

- Empower consumers with information to make better financial decisions.
- Promote financial education directly and through collaborations with other organizations.
- Develop education material through identification of common consumer complaints.
- Administer the Texas Financial Education Endowment Fund (TFEE) on behalf of the Finance Commission and manage a grant program that effectively supports financial education.

Support of Statewide Objectives

1. **Accountable to tax and fee payers of Texas.**

- Evaluate the effectiveness of agency financial education programs.
- Provide quarterly reporting of participants attending financial education courses.
- Administer the funds of the Texas Financial Education Endowment (TFEE) responsibly.
- Ensure adherence with self-leveling, self-funding and Self-Directed, Semi-Independent (SDSI) statutory requirements.

2. **Efficient such that maximum results are produced with a minimum waste of taxpayer funds, including through the elimination of redundant and non-core functions.**

- Streamline operations and improve processes when needed.
- Develop train the trainer programs.
- Evaluate and implement audit recommendations.

3. **Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.**

- Continuously review internal processes and program applications for opportunities to further automate or enhance features using advancing technologies.
- Provide professional development and training to staff on a continuous basis.

4. **Attentive to providing excellent customer service.**

- Provide extensive selection of consumer related information on the agency's website.
- Respond promptly to requests for educational materials and presentations.
- Seek feedback from stakeholders through a customer service survey.

5. Transparent such that agency actions can be understood by any Texan.

- Provide quarterly reporting of financial education outreach to the Finance Commission.
- Provide regular reporting on TFEE grant activities.
- Publish a training schedule on the agency website.

Other Considerations

The OCCC's financial education staff actively seek opportunities to provide in-person presentations to financially vulnerable populations and develop educational materials specific to the consumer. The extent of the effects of the COVID-19 pandemic on the economy and individuals is uncertain. One possible outcome is an increased need by consumers for the financial services regulated by the OCCC. The agency will continue to support consumers with financial education resources.

The OCCC administers the Texas Financial Education Endowment (TFEE), which awards grants on a two-year cycle to organizations that provide K-12 financial education, adult financial education, and financial coaching. The 2020-2021 grant cycle began March 1, 2020, and will end December 31, 2021. The OCCC continues to adapt and improve its grantee selection process and actively monitors grant recipients throughout the grant cycle.

GOAL D: Efficient and Effective Agency Operation

Deliver high quality, effective regulation of nonbank financial services by ensuring that the OCCC operates and performs at the highest standards of accountability, transparency, compliance, professional conduct and ethics, stewardship, and conservation of funds.

Actions Required to Achieve Goal

- Adhere to principles of transparency, compliance, and accountability.
- Ensure integrity of financial reporting and systems of internal control.
- Monitor budgets and tightly control expenditures.
- Embrace innovation and implement advancing technology to improve efficiency.
- Monitor and assess information technology security risks and develop mitigation strategies.
- Focus efforts that support staff retention and succession planning.
- Respond promptly and thoroughly to requests for information under the Public Information Act.
- Collaborate with DOB and SML on Finance Commission efforts to achieve greater efficiencies.

Support of Statewide Objectives

- 1. Accountable to tax and fee payers of Texas.**
 - Provide regular reporting of OCCC financial information.
 - Communicate with stakeholders regarding regulatory policy, administrative rulemaking, and budget development.
 - Ensure adherence with self-leveling, self-funding and Self-Directed, Semi-Independent (SDSI) statutory requirements.
- 2. Efficient such that maximum results are produced with a minimum waste of taxpayer funds, including through the elimination of redundant and non-core functions.**
 - Streamline operations and improve processes when needed.
 - Share information and collaborate with the other Finance Commission agencies.
- 3. Effective in successfully fulfilling core functions, measuring success in achieving performance measures, and implementing plans to continuously improve.**
 - Evaluate and implement technology solutions that drive gains in performance and efficiency.
 - Collaborate with other state and federal regulators to share information and improve overall industry compliance.
 - Invest in staff development to retain core staff and minimize costs of turnover and training.
- 4. Attentive to providing excellent customer service.**
 - Empower stakeholders with information by providing updated web content in a timely manner.
 - Ensure opportunities exist for stakeholder input regarding every aspect of the agency operations.
 - Seek feedback from stakeholders through a customer service survey.

5. Transparent such that agency actions can be understood by any Texan.

- Publish or make accessible data sets of public information that may be of interest to the general public.
- Encourage public participation on the agency's budget through a public hearing prior to submission to the Finance Commission.
- Publish procurement contracts on the agency's website.
- Seek input to improve the agency's services.

Other Considerations

Agency Overview

The OCCC is one of three agencies governed by the Texas Finance Commission. The mission of the Finance Commission is to ensure that banks, savings institutions, non-depository financial service providers, and other regulated entities chartered or licensed under state law operate as safe and sound institutions and increase the economic prosperity of the state. To support the Finance Commission's mission, the OCCC collaborates closely with its sister agencies, the Department of Banking (DOB), and the Department of Savings and Mortgage Lending (SML).

Financial Operation

Since 2009 the OCCC has operated as a Self-Funded Semi-Independent (SDSI) agency. This status is instrumental to the fulfillment of the OCCC's mission. SDSI status enables the OCCC to respond quickly and effectively to changing dynamics in the economy and the financial services landscape, including budget adjustments, immediate implementation of staffing changes and strategies, and salary adjustments. This ability to adjust and respond quickly enables the OCCC to operate more efficiently, react quickly to changing environments, and retain and attract qualified personnel and strive for more competitive salary levels with other state and federal agencies.

The OCCC derives its revenue through the collection of license and registration application fees, renewal fees and assessments, charges for agency publications and administrative services, and examination charges collected from regulated entities. The agency is responsible for all direct and indirect costs and does not receive any general revenue funds. The OCCC places all revenues in a separate account at the Texas Treasury Safekeeping Trust Company. Various provisions in the Texas Finance Code authorize the Commissioner to impose and collect fees to recover costs of examination, equitable or proportionate costs for the maintenance and operation of the agency, and costs of enforcement. The agency operates in a prudent and fiscally responsible manner while performing its statutory duties.

The agency's annual budget is evaluated and approved by the Finance Commission prior to any expenditures. The agency also holds a public budget hearing each year.

Building and Facilities

The OCCC maintains its headquarters in the Finance Commission Building, located at 2601 N. Lamar Boulevard, Austin, which it shares and co-owns with the other two Finance Commission agencies, DOB and SML. In an effort to relieve overcrowding and a deficiency in office, meeting room and parking space,

the agencies are pursuing relocation options. Legislation passed in 2017 would allow the Texas Department of Transportation to sell certain excess land to the agencies. The agencies are continuing to work with Texas Department of Transportation and Texas Department of Motor Vehicles to evaluate potential options. With the assistance of a contracted commercial real estate broker, the agencies are considering alternative options that will accommodate the unique requirements of all three agencies. Cash reserves have been set aside to cover future expenses related to the purchase or construction of a new building and relocation expenses.

Sunset Review and Ongoing Efficiency Collaboration

The OCCC was reviewed by the Texas Sunset Commission along with its sister agencies, SML and DOB, during the 2018-2019 review cycle. The Sunset Commission reported that, “the three finance agencies have weathered the storms of the financial crisis well and maintained transparent, accountable practices even with the recent decreased legislative oversight of the Legislature granted the agencies self-directed semi-independent status.” Further, the Sunset Commission stated that the “OCCC strikes an appropriate balance between protecting consumers and fostering a competitive business environment for lenders.”

The 86th Legislature continued the existence of the agency through August 31, 2031 with the passage of HB 1442. The OCCC worked diligently throughout 2019 and 2020 to implement numerous Sunset recommendations. One of the Sunset management actions directed the Finance Commission to minimize duplication of agency functions and promote more cost-efficient administration of the finance agencies. The Finance Commission directed an efficiency audit in response which was completed and reported to the Finance Commission in June 2019. The Finance Commission approved a plan that directs the agencies to establish workgroups to explore and collaborate on enhanced sharing opportunities in six areas: Budget and Accounting; Complaint Intake; Financial Education; Purchasing and Contracting; Human Resources; and Information Technology. The workgroups meet periodically to identify, recommend, and implement new measures to promote efficient administration. The agencies report the status and progress of the workgroups to the Finance Commission on a semi-annual basis. The first status update was presented to the Finance Commission in April 2020.

Agency Workforce

Included as Schedule F in this strategic plan is the OCCC’s Workforce Plan, which provides detailed information about the current state of the agency’s workforce and anticipated challenges and opportunities. The agency has prioritized the need to attract, develop, and retain qualified employees to support its various regulatory activities. The OCCC recognizes the need for its staff to continue to adapt to changing technologies, and will continue to build and strengthen its workforce to ensure effective service to stakeholders.

Efficiency and Collaboration

Over the past several years, the OCCC has migrated numerous key functions to its online portal, ALECS, making it a one-stop-shop for applicants, complainants, licensees and registrants. The OCCC is committed to supporting and improving this valuable asset to create an even more robust online

platform. ALECS is one example of how the OCCC is working to eliminate paper-based systems and processes and create cost-saving efficiencies throughout the agency.

The OCCC works to develop effective, collaborative relationships with its regulated industries, legislative offices, consumer groups, and regulatory counterparts. OCCC staff serve in a variety of roles. OCCC staff are long-time active participants in the National Association of Consumer Credit Administrators (NACCA), with the commissioner presently serving as an officer and also having previously served in all leadership positions. Other staff members are active on various committees. Staff also actively participate with the American Association of Residential Mortgage Regulators (AARMR) and provide presentations at industry conferences.

Changing Economic and Financial Landscape

A surge in financial technology applications is creating new regulatory developments throughout the financial services industry. The OCCC will need to adapt quickly to new opportunities and challenges. The OCCC intends to remain a leader in financial service regulation and work in collaboration with its regulatory counterparts.

The OCCC is completing this strategic plan amidst the COVID-19 pandemic, which has created new challenges and uncertainties for the agency, its regulated industries, and consumers. The economic and societal changes resulting from this global event will have longer term impact on the financial services industries and the consumers they serve. The OCCC reacted and adapted quickly to a remote work environment, and has worked diligently to maintain service levels and support consumers and its regulated industries. The lessons learned from this event will likely provide lasting improvements to the agency's operations.

REDUNDANCIES AND IMPEDIMENTS

STATUTORY & RULE RELATED REDUNDANCIES AND IMPEDIMENTS	
SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	Various provisions of the Texas Finance Code state that a business may surrender its license by delivering the license and written notice of the surrender to the OCCC. Tex. Fin. Code §§ 342.160, 348.510, 351.160, 353.510, 371.257, 393.617.
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	These provisions are based on the assumption that the OCCC will issue a physical paper license to the licensee. These provisions do not account for issuing licenses electronically, and do not specify that the OCCC can develop an appropriate process to surrender a license electronically.
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	Amend §§ 342.160, 348.510, 351.160, 353.510, 371.257, and 393.617 to specify that a licensee may surrender a license if the licensee complies with the OCCC's instructions.
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	The statute will allow the OCCC to specify an efficient, appropriate procedure for surrendering licenses electronically, supporting a move to an electronic, digital environment that does not require physical paper.

SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	The OCCC is required to keep pawnshop rules "in a permanent record book," and to mail a copy of a new rule to each license holder. Tex. Fin. Code § 371.006. A rule may not take effect until 21 days after it has been mailed.
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	This provision is outdated and does not reflect the fact that adopted rules are now available on the Texas Secretary of State's website. This provision is also redundant with the rule-submission requirements of the Texas Administrative Procedure Act.
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	Repeal § 371.006(b)-(d).
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	The statute will allow the OCCC to submit pawnshop rules through an efficient online process, without also having to send paper mailings. For each adopted pawnshop rule action, the OCCC will save approximately \$108 in mailing costs and \$34.84 in printing costs.

SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	The OCCC is required to keep regulated lending rules “in a permanent book.” Tex. Fin. Code § 342.551(c).
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	This provision is outdated and does not reflect the fact that adopted rules are now available on the Texas Secretary of State’s website. This provision is also redundant with the rule-submission requirements of the Texas Administrative Procedure Act.
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	Repeal § 342.551(c).
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	The statute will allow the OCCC to submit regulated lending rules through an efficient online process, ensuring consistency with the Texas Administrative Procedure Act.

SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	Many provisions of the Finance Code state that the OCCC may take enforcement actions after “notice and an opportunity for a hearing,” but a provision for pawnshop employees states that the agency may take action after “notice and a hearing”: Tex. Fin. Code § 371.255.
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	This provision impedes the agency’s ability to resolve cases efficiently where the respondent has not requested a hearing.
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	Amend § 371.255 to specify that the agency may take action after notice and an opportunity for a hearing.
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	This change would ensure that respondents receive due process while maintaining the agency’s ability to resolve cases efficiently.

SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	The Finance Code describes fees that a debt management provider may charge. Tex. Fin. Code § 394.210. The Finance Code also requires the OCCC to compute and publish annual adjustments to these fees based on the Consumer Price Index. Tex. Fin. Code § 394.2101. The section providing these adjustments states that all dollar amounts for charges under Section 394.210 are rounded to the nearest dollar, and all other charges are rounded to the nearest \$100.
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	Section 394.210 contains all the charges that are adjusted annually. This means that all amounts are rounded to the nearest dollar, and the reference to amounts being rounded to the nearest \$100 is superfluous.
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	Amend § 394.2101 to remove the reference to charges being rounded to the nearest \$100.
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	The statute would specify a clearer, more consistent method for the OCCC to compute and publish annual adjustments to debt management fee amounts.

NATURAL DISASTER-RELATED REDUNDANCIES AND IMPEDIMENTS	
SERVICE, STATUTE, RULE, OR REGULATION (PROVIDE SPECIFIC CITATION IF APPLICABLE)	N/A
DESCRIBE WHY THE SERVICE, STATUTE, RULE, OR REGULATION IS RESULTING IN INEFFICIENT OR INEFFECTIVE AGENCY OPERATIONS	N/A
PROVIDE AGENCY RECOMMENDATION FOR MODIFICATION OR ELIMINATION	N/A
DESCRIBE THE ESTIMATED COST SAVINGS OR OTHER BENEFIT ASSOCIATED WITH RECOMMENDED CHANGE	N/A

SUPPLEMENTAL SCHEDULES

Schedule A: Budget Structure – Goals Objectives and Performance Measures

As a Self-Directed Semi-Independent (SDSI) agency since 2009, the OCCC does not have a bill pattern in the General Appropriations Act. The OCCC, which is self-funding and self-leveling, is responsible for all costs and receives no appropriations from the General Revenue Fund. All revenues for operations derive from assessments and fees paid by regulated entities, and are placed in a separate account at the Texas Treasury Safekeeping Trust Company.

The Texas Finance Commission reviews and approves the OCCC's annual budget prior to any expenditures by the OCCC. The budgeting process begins in the last quarter of the fiscal year with the proposed budget presented at a public hearing typically at the end of July or in early August. The agency presents its final budget at the Finance Commission's regularly scheduled August meeting.

In response to recommendations from the OCCC's Sunset review, the OCCC reevaluated its performance measures to ensure they relate directly to agency goals, are consistent between all three Finance Commission agencies where feasible, and highlight the priorities of the agency. These updated measures are included below and will be reported on beginning fiscal year 2020.

GOAL A: CONSUMER PROTECTION

Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.

Objective A.1

Timely process and efficiently close complaints.

Strategy

Resolve complaints expeditiously, identify problem creditors and industry practices, and advise creditors and consumers of their rights, remedies and responsibilities.

Outcome Measures

- Percentage of written complaints closed within 90 days.
- Monies returned to consumers

Output Measures

- Number of complaints closed

Efficiency Measures

- Average number of days for all complaints to reach final disposition
- Average number of days to close a complaint
- Average cost per complaint

Objective A.2

Promote compliance in regulated industries through examinations and investigations.

Strategy

Examine and investigate regulated entities to determine the level of compliance with applicable statutes and regulations.

Outcome Measures

- Percentage of examinations reporting acceptable level of compliance
- Percentage of licensed locations and registered offices examined annually

Output Measures

- Number of examinations completed
- Number of investigations completed

Efficiency Measures

- Average direct cost per examination

Objective A.3

Engage in education and enforcement activities that encourage regulated industries to comply with applicable statutes and rules.

Strategy

Initiate and timely resolve administrative enforcement actions against regulated businesses that commit violations and engage in opportunities to encourage compliance.

Outcome Measures

- Percentage of repeat referrals for enforcement action
- Percentage of enforcement actions closed within targeted timeframe

Output Measures

- Number of enforcement actions taken
- Number of contested cases heard at SOAH
- Number of compliance aids and tools published
- Number of industry stakeholder and outreach events hosted or attended by OCCC staff

Efficiency Measures

- Average number of days to close an enforcement action

GOAL B: EFFECTIVE LICENSING & REGISTRATION

Provide a high quality and efficient licensing and registration process that maintains high standards for licensed or registered financial service providers and promotes a transparent, fair, and competitive financial services market.

Objective B.1

Complete a prompt and thorough review of all license applications submitted to the OCC.

Strategy

Investigate and process license applications for regulated businesses, pawnshop employees, and residential mortgage loan originators.

Outcome Measures

- Percentage of business license applications processed within 60 days

Output Measures

- Number of business license applications processed
- Number of pawnshop employee license applications processed
- Number of residential mortgage loan originator applications processed

Efficiency Measures

- Average processing time (days) for business license applications
- Average processing time (days) for pawnshop employee applications
- Average processing time (days) for residential mortgage loan originator applications

GOAL C: FINANCIAL EDUCATION

Educate consumers about their rights, remedies, and responsibilities. Encourage communication and cooperation among the non-depository financial services industry, the consumer public, and the agency. Promote the Texas Financial Education Endowment (TFEE) to support statewide financial capability and consumer credit building activities and programs.

Objective C.1

Increase awareness by providing Texans with access to resources and financial education opportunities and by creating transparency regarding consumer transactions.

Strategy

Develop and administer formal education programs specific to the subprime demographic and include general information brochures made available through state agency partners, financial service providers and trade organizations, and through participation in community events.

Output Measures

- Number of people receiving direct educational services

Objective C.2

Administer the Texas Financial Education Endowment (TFEE) on behalf of the Finance Commission and establish a program that effectively supports financial education, capabilities, and asset-building opportunities, and deploys fund earnings distributions of 3.5%.

Strategy

Solicit funding requests from organizations that strive to increase and promote financial capability of individuals, and encourage personal financial education and responsibility within the state of Texas.

Award endowment funds, through a competitive grant process that meets program objectives and goals as identified and prioritized for each grant cycle.

Output Measures

- Percentage of TFEE award recipients who reached their consumer participation goal within the grant period

GOAL D: EFFICIENT AND EFFECTIVE AGENCY OPERATION

Deliver high quality, effective regulation of nonbank financial services by ensuring that the OCCC operates and performs at the highest standards of accountability, transparency, compliance, professional conduct and ethics, stewardship, and conservation of funds.

Objective D.1

Maintain a reasonable staff turnover rate and ensure actual expenditures do not exceed budgeted amounts.

Strategy

Provide opportunities for career growth and professional development for OCCC employees. Engage in fiscal planning and budgeting that meets the needs of the agency while continuously monitoring expenses.

Outcome Measures

- Percentage of regular employees separated from the agency
- Percentage of actual expenditures to budgeted expenditures

Objective D.2

Provide information requested from the agency in a timely and efficient manner to promote agency transparency to the citizens of Texas.

Strategy

Closely monitor channels for receipt of information requests and prioritize the gathering of responsive information.

Outcome Measures

- Percentage of public information requests addressed within 5 business days

Output Measures

- Number of public information requests closed
- Number of public information requests withdrawn

Efficiency Measures

- Average number of days to address a public information request

Explanatory Measures

- Number of public information requests received

Schedule B: Performance Measure Definitions

Agency:	Office of Consumer Credit Commissioner
Goal:	Consumer Protection: Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.
Objective:	Timely process and efficiently close complaints.
Strategy:	Resolve complaints expeditiously, identify problem creditors and industry practices, and advise creditors and consumers on their rights, remedies, and responsibilities.

Outcome Measure: Percentage of written complaints closed within 90 days.

Definition

Total number of written complaints processed by Consumer Assistance in 90 calendar days or less divided by the total number of all written complaints processed by Consumer Assistance.

Purpose

The measure provides useful information for management purposes and is helpful for noting variances and determining resource allocation.

Data Source

Complaints are recorded in the OCCC's online portal, ALECS. Complaints are entered either by the complainant or by OCCC Consumer Assistance staff. ALECS captures the date the complaint is closed and calculates the number of days from the date the complaint is received and the date it is closed.

Methodology

Divide the total number of written complaints processed within 90 calendar days or less during the reporting period by the total number of all written complaints processed during the reporting period. Report the result as a percentage.

Data Limitations

Consumers and financial service providers may not respond to the agency's requests for information which can extend complaint processing time. Additionally, complex complaints can

Calculation Method

Noncumulative

require significant investigation that can also extend complaint processing time.

New Measure
Yes

Target Attainment
Higher than target

Outcome Measure: Monies returned to consumers.

Definition

Refunds made to consumers as a result of agency action.

Purpose

This measure provides insight into the monetary impact on consumers of actions taken by the OCCC.

Data Source

Refunds to consumers are generally made as a result of complaint, investigation, examination, licensing or enforcement actions. Restitution from complaints, investigations, and examinations are tracked in the OCCC's online portal, ALECS. Proof of refunding is obtained through the complaint, investigation, and examination processes. Once confirmed, the amounts are entered into the appropriate workitem in ALECS. Refunding confirmed through the licensing process and enforcement process are reported separately, on a monthly basis, to the Consumer Protection Department.

Methodology

The amount of monetary restitution from complaint, field investigation resolution, licensing, and legal is summed. The performance measure result will be reviewed and certified at least annually.

Data Limitations

This measure is driven largely by complaints and the level of compliance during examinations. Refunds resulting from complaints, investigations and examination will be verified by reviewing check copies or account histories. If the number of accounts requiring refunds is substantial, sampling may be used to verify the cumulative refund totals.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Output Measure: Number of complaints closed.

Definition

Total number of all complaints closed by Consumer Assistance during the reporting period.

Purpose/Importance

This measure provides information on the number of complaints closed whether they were closed administratively or as the result of resolution.

Source/ Collection of Data

Complainants enter a record of their complaint into the system or Consumer Assistance staff members enter a record of oral and written complaints received into the system. Next, contact with the licensee may be initiated or a request for information from the consumer is made. The actions taken and a summary of the complaint are documented or coded in the system. Complaints can be in the Agency's jurisdiction or nonjurisdictional. Nonjurisdictional complaints are classified as "other" and are referred to the appropriate organization. When a complaint is closed, a notation is made in the system detailing the resolution date, a specific statement of resolution expressing the action that resulted in the complaint closing, and the number of processing days required to resolve the complaint is calculated by the system. A report is generated from the system. A monthly report is submitted to executive management summarizing this activity.

Method of Calculation

The system sums the total of all complaints in which the closure date falls within the reporting period. The performance measure result will be reviewed and certified at least quarterly.

Data Limitations

The number of complaints received may fluctuate based on consumer issues during the reporting period. This measure can be useful as a measure of activity but the number of complaints received cannot be controlled by the department.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Efficiency Measure: Average number of days for all complaints to reach final disposition.

Definition

The average number of days for a complaint to reach final disposition during a reporting period in consumer assistance, investigation, and legal.

Purpose/Importance

This measure shows the agency's efficiency at processing complaints.

Source/ Collection of Data

Complaint data is reconciled between departments on a regular basis. This data is used to generate a report which lists the date complaints were received and the date complaints reached final disposition.

Method of Calculation

Total number of days the complaint takes to reach final disposition within each department divided by the number of complaints reaching final disposition within the reporting period.

Data Limitations

The agency has no control over the number of complaints it receives or the complexity and seriousness of the complaints made. The number of complaints impacts the investigative workload. The complexity impacts the degree of effort required to investigate the complaint. Any combination of these factors will impact the length of time necessary to resolve the complaint.

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Lower than target

Efficiency Measure: Average number of days to close a complaint.

Definition

The average number of days to close a complaint for all complaints received during the reporting period in consumer assistance.

Purpose/Importance

The measure shows the agency's efficiency at processing complaints.

Source/ Collection of Data

The system generates a report which lists the dates complaints were received and the dates complaints were closed.

Method of Calculation

Total number of days to close complaints divided by the total number of complaints closed during the reporting period.

Data Limitations

The agency has no control over the number of complaints it receives or the complexity and seriousness of the complaints made. The number of complaints impacts the investigative workload. The complexity impacts the degree of effort required to investigate the complaint. Any combination of these factors will impact the length of time necessary to resolve the complaint.

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Lower than target

Efficiency Measure: Average cost per complaint.

Definition

This measure provides the average cost to process a complaint through closure.

Purpose/Importance

This measure shows how cost effective the department is when closing complaints.

Source/ Collection of Data

Costs are obtained from the financial reports prepared by the agency's accounting section. The number of complaints closed is obtained from a report generated by the complaint system.

Method of Calculation

Total costs for the complaints accounting strategy for the reporting period, divided by the total number of complaints closed.

Data Limitations

The number of complaints received is outside of the department's control and therefore the number of complaints closed can vary from one period. The level of complaint activity will impact this measure.

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Lower than Target

Agency:	Office of Consumer Credit Commissioner
Goal:	Consumer Protection: Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.
Objective:	Promote compliance in regulated industries through examinations and investigations.
Strategy:	Examine and investigate regulated entities to determine the level of compliance with applicable statutes and regulations.

Outcome Measure: Percentage of examinations reporting acceptable level of compliance.

Definition

Total number of examinations of business licensees finalized with an acceptable level of compliance (rating 1, 2, or 3) during the reporting period divided by the total number of all finalized examinations of business licensees during the reporting period.

Purpose/Importance

This measure provides information on the extent to which licensed locations and registered offices are in substantial compliance with the applicable state and federal laws. The agency's examination function provides a regulatory review of transactions and ensures compliance. These compliance examinations may result in monetary restitution to Texas consumers that cure violations of Texas laws.

Source/ Collection of Data

Examinations are scheduled based upon on compliance risk. Once scheduled, an examination is conducted. Upon completion of the examination, the examiner will assign a rating signifying the licensed location's or registered office's overall compliance level. The Report of Examination is provided to the licensee in the system. The agency produces reports from the system reflecting the examinations finalized and the examination ratings. The data from these reports is used to calculate the percentage of examinations reporting an acceptable level of compliance. A monthly report is submitted to executive management summarizing this activity.

Method of Calculation

A percentage is obtained by dividing the total number of examinations of licensed locations and registered offices finalized with an acceptable level of compliance (as

determined by the agency), by the total number of finalized examinations of licensed locations or registered offices during the reporting period. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The agency's examiners make a determination of compliance levels and use a rating system to identify licensed locations or registered offices with an acceptable or unacceptable level of compliance. These examination ratings are based upon the agency's regulatory analysis. This measure is driven by the level of licensee compliance.

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Higher than target

Outcome Measure: Percentage of licensed locations and registered offices examined annually.

Definition

The percentage of licensed locations and registered offices examined annually.

Purpose/Importance

This measure provides information on the extent to which the agency is able to effectively regulate the financial service providers operating in Texas. As a part of its regulatory program, the agency performs compliance examinations that often result in correction of licensee's procedures.

Source/ Collection of Data

Examinations are scheduled on a risk basis. Once processed, information from the examination is entered into the system. The amount reported is the number of examinations finalized during the period divided by the total number of active licensed locations and registered offices at the end of the reporting period. A monthly report is submitted to executive management.

Method of Calculation

A percentage is obtained by dividing the total number of examinations finalized during a reporting period by the total of all active licensed locations and registered offices as of the last day of the reporting period and then displayed as a percentage. The calculation is automated within the system. The performance

measure result will be reviewed and certified at least annually.

Data Limitations

The number of active licensed locations and registered offices changes continually. The percentage derived as of the end of each reporting period may be subject to variation should a large group of licenses be issued, canceled, or inactivated during the reporting period. Additionally, the measure is subject to the same data limitations of the output measure "number of compliance examinations performed".

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Higher than target

Output Measure: Number of examinations completed.

Definition

The total number of examinations of licensed locations and registered offices finalized during the reporting period.

Purpose/Importance

The purpose of this measure is to track the number of compliance exams conducted by the agency staff during the reporting period. This measure provides useful information to management regarding variances and resource allocation.

Source/ Collection of Data

Examinations are based upon a risk assessment. Once completed, the examination details are entered into the system. A monthly report is submitted to executive management summarizing this activity.

Method of Calculation

The system counts the number of examinations finalized during a reporting period. The performance measure result will be reviewed and certified at least quarterly.

Data Limitations

Examinations are counted when the

Calculation Type

Cumulative

report is finalized. The report is finalized when the examiner enters all the relevant details into the system.

New Measure

No

Target Attainment

Higher than target

Output Measure: Number of investigations completed.

Definition

Total number of investigations closed during the reporting period. Closure is the resolution or lack of evidence of the complaint issue.

Purpose/Importance

The measure provides information relative to the number of field investigations closed, types of investigations, length of time to close those investigations, and the final disposition of those investigations.

Source/ Collection of Data

Information is obtained from several sources that may trigger a field investigation: consumer complaints, agency identified alleged violations, law enforcement agency referrals, or industry complaints. When a complaint is received (either orally or in writing), a record is entered into the system. Additional information may be requested from the complainant or contact with the complaint provider may be initiated to assist with resolution of the complaint. The actions taken and a summary of the complaint are documented in the system. On occasion, field examiners or office staff may observe activities or obtain information that a company is not in compliance with state statutes. On these occasions, a field investigation may be assigned to obtain the necessary information for the agency to determine any actions required to bring the party into compliance. When a complaint rises to the magnitude to necessitate a field investigation, it is assigned to an investigator by senior examination staff and entered into the system. The professional analysis of the senior examination team must be relied upon to make the appropriate allocation of resources. All investigation assignments and closures are reviewed and approved by the Director of Consumer Protection. A report is generated from the system identifying the number of investigations that are closed during the reporting period. This report is reviewed by executive management on a weekly and annual basis.

Method of Calculation

The system sums the number of investigations closed within the reporting period. The performance measure result will be reviewed and certified at least quarterly.

Data Limitations

This measure is largely driven by complaints. The agency is unable to control complaint volume, level of cooperation by the industry, or level of responsiveness by entities being investigated, all of which directly impact the agency's performance on this measure.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Efficiency Measure: Average cost per examination.

Definition

This measure provides the average cost to finalize an examination.

Purpose/Importance

This measure shows how cost effective the Consumer Protection Department is when finalizing examinations.

Source/ Collection of Data

Costs are obtained from the financial reports prepared by the agency's accounting section. The number of exams finalized is obtained from a report generated by the system.

Method of Calculation

Total attributable costs for the exam accounting strategy for the reporting period, divided by the total number of examinations finalized for the reporting period.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Higher than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Consumer Protection: Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.
Objective:	Engage in education and enforcement activities that encourage regulated industries to comply with applicable statutes and rules.
Strategy:	Initiate and timely resolve administrative enforcement actions against regulated businesses that commit violations and engage in opportunities to encourage compliance.

Outcome Measure: Percentage of repeat referrals for enforcement action.

Definition

The total number of cases opened during the reporting period where another case against the same respondent was opened within the past 18 months divided by the total number of cases opened within the same time period.

Purpose/Importance

This measure provides information on the extent to which agency enforcement actions are sufficient to prevent future violations and continued compliance.

Source/ Collection of Data

ALECS captures the master file number for each case against a licensee and some applicants in the MF Num field, and the date the case is opened in the Date Accepted field. For cases against businesses or individuals without a license, the name of the business is captured in the Name and DBA fields. Monthly, a list of cases opened for the month is compared to a report of all cases opened from the first of the month 18 months ago to the last day of the month for the month before the reporting period. Comparisons are made by master file number, and business or individual names where there is no master file number. The number of cases where there is a match are counted – these are the repeat cases. Divide the number of repeat cases by the number of cases for the month and represent it as a percentage. The monthly calculations can be consolidated to create percentages for longer periods. Add the number of repeat cases for each month of the reporting period and divide it by the number of cases opened for the reporting period.

Method of Calculation

The count of the entries that are closed through a final order during a reporting period is totaled and reported. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The measure does not include enforcement actions that were closed without an order (e.g., informal resolution, dismissal, assurance of voluntary compliance). Beginning an enforcement action may influence licensees as well as non-licensees to comply and to enter a settlement with the agency.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Outcome Measure: Percentage of enforcement actions closed within targeted timeframe.

Definition

Total number of cases of each level closed within the reporting period divided by the total number of cases closed during the reporting period.

Purpose/Importance

This measure enables the legal team to evaluate the timeliness of its actions in relation to the complexity level of the cases on its docket to ensure appropriate resource allocation.

Source/ Collection of Data

Each case opened is assigned a complexity level on a scale of 1-4, with 4 being the most complex. The case level is added to the Docket Num field of the workitem with a * prefix. The * is used to delineate the level from other text in the Docket Num field. A goal is assigned to each level: Level 1, 90 days; Level 2, 180 days; Level 3, 365 days; and Level 4, 730 days. ALECS captures the date a case is opened in the Date Accepted field. ALECS captures the date a case is closed in the Closed Date field. A Legal Flex Report is run to capture the Docket Num, Date Accepted and Closed Date fields for all cases closed during the reporting period.

Method of Calculation

Subtract the Date Accepted from the Closed Date for each case to calculate the number of days the case was open. For cases closed during the reporting period, compare the number of days open to the number of days associated with the level of the case. Count the number of cases closed at or below the goal assigned to each case level and divide this number by the total number of cases closed during the reporting period.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Higher than target

Output Measure: Number of enforcement actions taken.

Definition

The total number of administrative enforcement cases closed by a final order. These may include administrative injunctions (ordering a person to cease and desist unlawful conduct, or to take affirmative action to comply with the law), administrative penalty assessments, restitution orders, and license suspensions and revocations.

Purpose/Importance

This measure provides information on the extent to which the agency effectively regulates the consumer financial services industry in Texas. An enforcement action may be necessary if a business refuses to comply with Texas law or fails to respond to agency instructions.

Source/ Collection of Data

All enforcement actions are opened as a case in ALECS. When a case is closed, the user selects from a list of closing codes and closing documents that represent the manner in which the case was closed. A Legal Flex Report is run to capture the Close Code and Closing Doc fields for all cases closed during the reporting period.

Method of Calculation

Subtract any cases closed without a final order during the reporting period from the total number of cases closed for the reporting period. Cases closed or dismissed without legal action, or any case without a final order with the following close codes: closed by expired or canceled license; license approved prior to

hearing; and closed by surrender of license are subtracted from the total number of cases closed during the reporting period.

Data Limitations

The measure does not include enforcement actions that were closed without an order (e.g., informal resolution, dismissal, assurance of voluntary compliance). Beginning an enforcement action may influence licensees as well as non-licensees to comply and to enter a settlement with the agency.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Output Measure:

Number of contested cases heard at the State Office of Administrative Hearings (SOAH).

Definition

The number of hearings held before SOAH that did not result in a default.

Purpose/Importance

This measure reflects the number of enforcement actions appealed to SOAH for hearing where the appellant appeared and participated in the hearing. These actions may include license or registration denials or revocations, or any other enforcement action taken by the OCCC.

Source/ Collection of Data

If the agency issues an enforcement order or denies an application for a license or registration, the respondent or applicant has the right to appeal that decision to SOAH. The person may appeal by sending the agency a request for a hearing. Upon receipt of the request, the agency makes a docket request to SOAH and notifies the person of the hearing date and the facts and laws at issue. A SOAH judge conducts the hearing and issues a proposal for decision. All cases scheduled at SOAH are added to the legal department's internal calendar.

Method of Calculation

Review the legal department calendar for hearings scheduled during the reporting period. Confirm whether or not the hearing resulted in a default. Count

the number of hearings held during the reporting period and subtract the number of hearings that resulted in a default during the reporting period.

Data Limitations

SOAH hearings may be canceled before an actual hearing occurs because the agency is able to resolve the issues through an agreed settlement, or the person withdraws the hearing request. This measure captures the number of hearings in which agency staff actually participates.

Calculation Type

Cumulative

New Measure

Yes

Target Attainment

Higher than target

Output Measure: Number of compliance aids and tools published.

Definition

Number of compliance-related articles, advisory letters, advisory bulletins, enforcement action and corrective action summaries published by OCCC staff.

Purpose/Importance

This measure relates to guidance published by the agency to avoid common problems and pitfalls when applying Texas credit laws. OCCC compliance aids and tools help financial service providers to avoid costly compliance mistakes, help to create a level playing field for all market participants, and consistent protection for consumers. These aids and tools provide an educational outreach from the regulatory authority to industry representatives that support the overarching goal of consumer protection.

Source/ Collection of Data

The legal department tracks advisory letters and bulletins published in Excel spreadsheets and in its monthly internal reports. A revised version of an existing advisory bulletin is not counted for the purpose of this measure. Any compliance aids or tools published by other OCCC departments are tracked in those areas and reported separately.

Method of Calculation

Combine the number of compliance aids and tools reported for each department during the reporting period.

Data Limitations

OCCC staff draft bulletins in response to potential or pervasive compliance issues that should be addressed directly by the industry. This measure is driven by improper financial provider practices or requests from stakeholders for clarification of an issue. Generally, the number of practices brought to the agency's attention and requests made during each reporting period is beyond the agency's control.

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Higher than target

Output Measure: Number of industry stakeholder and outreach events hosted or attended by OCCC staff.

Definition

Total number of OCCC-hosted stakeholder meetings (in person and online), and events where OCCC staff are presenting.

Purpose/Importance

This measure provides valuable information about how the agency interacts with its stakeholders. These events enable OCCC staff to provide an educational resource to its regulated industries, share and receive feedback on its rulemaking process, and keep up to date on emerging issues and concerns.

Source/ Collection of Data

The OCCC's legal department maintains a shared Excel spreadsheet. Events are added by each department.

Method of Calculation

Count the number of events logged for the reporting period in the shared Excel spreadsheet.

Data Limitations

The number of rule-related stakeholder events is contingent upon the number of rule reviews completed each year, and

Calculation Type

Cumulative

the number of legislative changes that require rule updates. Other events may be attended by invitation.

New Measure

Yes

Desired Performance

Higher than target

Efficiency Measure: Average number of days to close an enforcement action.

Definition

Total number of days open divided by the number of enforcement actions closed for all enforcement actions closed during the reporting period.

Purpose/Importance

This measure provides insight into how expeditiously the agency handles its enforcement actions.

Source/ Collection of Data

ALECS captures the date a case is opened in the Date Accepted field, and the date a case is closed in the Closed Date field. A Legal Flex Report is run to capture the Date Accepted and Closed Date fields for all cases closed during the reporting period.

Method of Calculation

Subtract the Date Accepted from the Closed Date for each case to calculate the number of days the case was open. Sum the number of days open and divide by the number of cases closed.

Data Limitations

The OCCC can sometimes have limited control over the number of days an enforcement action is open, especially cases that are referred on to district or federal court.

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Lower than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Effective Licensing & Registration: Provide a high quality and efficient licensing and registration process that maintains high standards for licensed or registered financial service providers and promotes a transparent, fair, and competitive financial services market.
Objective:	Complete a prompt and thorough review of all license application submitted to the OCCC.
Strategy:	Investigate and process license applications for regulated business, pawnshop employees, and residential mortgage loan originators.

Outcome Measure: Percentage of business license applications processed within 60 days.

Definition

The total number of business license applications processed in 60 days or less divided by the total number of business license applications processed during the reporting period.

Purpose/Importance

This measure provides information on the extent to which the agency was able to efficiently process applications and fulfill its statutory responsibility to license and regulate the financial services industry in Texas.

Source/ Collection of Data

Applications are received either through 1) direct entry of information by the applicant into the online regulatory platform, ALECS, or 2) receipt of paper based forms, which requires manual entry into ALECS by agency staff. As applications are entered into ALECS and accompanying payments are recorded, each application is assigned a receipt date. When a final action (approval, denial, or withdrawal) is taken on an application, that action is entered into the database and a completion date is assigned to the application. ALECS produces a report based on the activity in the reporting period that totals the number of days from the receipt date to the completion date for all license applications with a final action during that reporting period. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

ALECS counts the total number of days from receipt date to completion date for applications having a final action during the reporting period. The database then

sums the days and divides the total number of processing days by the number of applications processed during the reporting period. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The activity in the industry, the volume of applications received, the timeliness of applicant responses to requests for additional information, and the ability of the agency to timely receive criminal history information from the Texas Department of Public Safety and the Federal Bureau of Investigations, all of which are unpredictable and outside of the agency's control, directly impact the agency's performance.

Calculation Type

Non-cumulative

New Measure

Yes

Target Attainment

Higher than target

Output Measure: Number of business license applications processed.

Definition

The total number of business license applications processed to a final action (approved, denied or withdrawn) during the reporting period.

Purpose/Importance

This measure provides information on the extent to which the agency fulfills its statutory responsibility to license and regulate the financial services industry in Texas.

Source/ Collection of Data

Applications are received either through 1) direct entry of information by the applicant into the online regulatory platform, ALECS, or 2) receipt of paper based forms, which requires manual entry into ALECS by agency staff. As applications are entered into ALECS and accompanying payments are recorded, each application is assigned a receipt date. When a final action (approval, denial, or withdrawal) is taken on an application, that action is entered into the database and a completion date is assigned to the application. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

The database counts all applications that have had final action during the reporting period. The performance measure result will be reviewed and certified at least quarterly.

Data Limitations

The activity in the industry, the timeliness of applicant responses to requests for additional information, and the volume of applications received, which are unpredictable and outside the agency's control, directly impact the agency's performance.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Output Measure: Number of pawnshop employee license applications processed.

Definition

The total number of pawnshop employee license applications with a final action.

Purpose/Importance

This measure provides information on the extent to which the agency was able to process pawnshop employee applications and fulfill its statutory responsibility to license and regulate pawnshop employees in Texas.

Source/ Collection of Data

Applications are received either through 1) direct entry of information by the applicant into the online regulatory platform, ALECS, or 2) for the most part we do not accept paper applications. However, if we do receive applications of paper based forms, they require a manual entry into ALECS by agency staff. As applications are entered into ALECS and accompanying payments are recorded, each application is assigned a receipt date. When a final action (approval, denial, or withdrawal) is taken on an application, that action is entered into the database and a completion date is assigned to the application. Upon an employee's termination from a pawnshop, a final action (withdrawal) is entered into ALECS and a date of action is assigned to the record. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

ALECS counts all applications with a final action during the reporting period. The performance measure result will be reviewed and certified at least quarterly.

Data Limitations

The activity in the industry, the timeliness of applicant responses to requests for additional information, and the volume of applications received, which are unpredictable and outside the agency's control, directly impact the agency's performance.

Calculation Type

Cumulative

New Measure

No

Target Attainment

Higher than target

Output Measure: Number of residential mortgage loan originator applications processed.

Definition

The total number of residential mortgage loan originator applications with a final action.

Purpose/Importance

This measure provides information about the processing time for licensed applications for individuals in the property tax lending, manufactured housing, secondary mortgage origination and servicing, and home equity industries regulated by the agency.

Source/ Collection of Data

Applications for a new residential mortgage loan originator license are received through the nationwide mortgage licensing system (NMLS). When the application investigation is complete, a final action (approval or denial) is taken on the application and the outcome is entered into NMLS with the date of action. Upon notification of an applicant's status change, the date of action is entered. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

The nationwide mortgage licensing system counts all applications with a final action during the reporting period. The performance measure will be reviewed and certified at least quarterly.

Data Limitations

This activity and the volume of applications received, which are unpredictable and outside the agency's control, directly affect the agency's performance. When an applicant fails to respond to requests for information, the application must be closed through application abandonment. This is issued only after requests for information go unanswered.

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Higher than target

Efficiency Measure: Average processing time (days) for business license applications.

Definition

The total average time (in days) to take final action on a license application.

Purpose/Importance

This measure provides information on the extent to which the agency was able to efficiently process applications and fulfill its statutory responsibility to license and regulate the financial services industry in Texas.

Source/ Collection of Data

Applications are received either through 1) direct entry of information by the applicant into the online regulatory platform, ALECS, or 2) receipt of paper based forms, which requires manual entry into ALECS by agency staff. As applications are entered into ALECS and accompanying payments are recorded, each application is assigned a receipt date. When a final action (approval, denial, or withdrawal) is taken on an application, that action is entered into the database and a completion date is assigned to the application. ALECS produces a report based on the activity in the reporting period that totals the number of days from the receipt date to the completion date for all license applications with a final action during that reporting period. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

ALECS counts the total number of days from receipt date to completion date for applications having a final action during the reporting period. The database then

sums the days and divides the total number of processing days by the number of applications processed during the reporting period. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The activity in the industry, the volume of applications received, the timeliness of applicant responses to requests for additional information, and the ability of the agency to timely receive criminal history information from the Texas Department of Public Safety and the Federal Bureau of Investigations, all of which are unpredictable and outside of the agency's control, directly impact the agency's performance.

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Lower than target

Efficiency Measure: Average processing time (days) for pawnshop employee applications.

Definition

The total average time (in days) to take final action on a pawnshop employee license application.

Purpose/Importance

This measure provides information on the extent to which the agency was able to process pawnshop employee applications efficiently and fulfill its statutory responsibility to license and regulate pawnshop employees in Texas.

Source/ Collection of Data

Applications are received either through 1) direct entry of information by the applicant into the online regulatory platform, ALECS, or 2) for the most part we do not accept paper applications. However, if we do receive applications of paper based forms, they require a manual entry into ALECS by agency staff. As applications are entered into ALECS and accompanying payments are recorded, each application is assigned a receipt date. When a final action (approval, denial, or withdrawal) is taken on an application, that action is entered into the database and a completion date is assigned to the application. ALECS produces a report based on the activity in the reporting period that totals the number of days from

the receipt date to the completion date for all license applications with a final action during that reporting period. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

ALECS counts the total number of days from receipt date to completion date for applications having a final action during the reporting period. The database then sums the days and divides the total number of processing days by the number of applications processed during the reporting period. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The activity in the industry, the volume of applications received, the timeliness of applicant responses to requests for additional information, and the ability of the agency to timely receive criminal history information from the Texas Department of Public Safety and the Federal Bureau of Investigations, all of which are unpredictable and outside of the agency's control, directly impact the agency's performance

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Lower than target

Efficiency Measure: Average processing time (days) for residential mortgage loan originator applications.

Definition

The total average time (in days) to take final action on a residential mortgage loan originator application.

Purpose/Importance

This measure provides information about the processing time for individual loan officers licensed in property tax lending, manufactured housing, secondary mortgage origination and servicing, and home equity industries regulated by the agency.

Source/ Collection of Data

An application for a new residential mortgage loan originator license is received through the nationwide mortgage licensing system (NMLS). When the application investigation is complete, a final action (approval or denial) is taken and the date of action is entered into NMLS. The system produces a report based upon activity in the reporting period that totals the number of days from the completion date to date of action for all license applications with a final action during the reporting period. A monthly report is submitted to executive management summarizing the activity.

Method of Calculation

The system provides reports where days outstanding can be calculated. The performance measure result will be reviewed and certified at least annually.

Data Limitations

The activity in the industry, the volume of applications received, the timeliness of applicant responses to requests for additional information, and the ability of the agency to timely receive pertinent information all of which are unpredictable and outside the agency's control, directly impact the agency's performance.

Calculation Type

Non-cumulative

New Measure

No

Target Attainment

Lower than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Financial Education: Educate consumers about their rights, remedies, and responsibilities. Encourage communication and cooperation among the nonbank financial services industry, the consumer public, and the agency. Promote the Texas Financial Education Endowment (TFEE) to support statewide financial capability and consumer credit building activities and programs.
Objective:	Increase awareness by providing Texans with access to resources and financial education opportunities and by creating transparency regarding consumer transactions.
Strategy:	Develop and administer formal education programs specific to the subprime demographic and include general information brochures made available through state agency partners, financial service providers and trade organizations, and through participation in community events.

Output Measure: Number of people receiving direct educational services.

Definition

Number of people attending financial education presentations and events.

Purpose/Importance

This measure provides feedback on the number of Texas consumers reached through agency initiatives.

Source/ Collection of Data

Consumer Education staff collect participant signatures during community presentations. Additional sources of data collection include the number of registrants participating in financial education webinars.

Method of Calculation

The number of participants are summed. The calculation will be reviewed and certified at least quarterly.

Data Limitations

The agency counts the attendees at each event where it participated and at

Calculation Type

Cumulative

which it provides educational information to those attendees.

New Measure
Yes

Target Attainment
Higher than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Financial Education: Educate consumers about their rights, remedies, and responsibilities and encourage communication and cooperation among the nonbank financial services industry, the consumer public, and the agency. Promote the Texas Financial Education Endowment (TFEE) to support statewide financial capability and consumer credit building activities and programs.
Objective:	Administer the Texas Financial Education Endowment (TFEE) on behalf of the Finance Commission and establish a program that effectively supports financial education, capabilities, and asset-building opportunities, and deploys fund earnings distributions of 3.5 %.
Strategies:	<p>Solicit funding requests from organizations that strive to increase and promote financial capability of individuals, and encourage personal financial education and responsibility within the state of Texas.</p> <p>Award endowment funds, through a competitive grant process that meets program objectives and goals as identified and prioritized for each grant cycle.</p>

Output Measure: Percentage of TFEE award recipients who reached their consumer participation goal within the grant period.

Definition

Number of participants (reported by grantee) divided by the grant term goal as established on the grant application reported based on grant cycle.

Purpose/Importance

This measure provides information on the extent to which the grantee was able to achieve the goal of promoting financial education and responsibility. This information helps to create well-informed, educated consumers empowered to make good financial choices.

Source/ Collection of Data

This agency will collect data from the semiannual grant reports submitted by TFEE grantees. This method of data collection gives an accurate depiction of the number of those who benefit from grant funded activities.

Method of Calculation

Grant recipients submit periodic performance reports. The TFEE grant coordinator maintains an electronic record of all data reported by grant recipients

and the number of consumers served or trained by the grant recipient is summed.

Data Limitations

Number of consumers served or trained is reported by grant recipients and collected by the grant administrator only during grant funding cycles. Once the grant recipient ceases to provide the grant-funded program services or is no longer receiving grant funds, data is not reported to the grant administrator.

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Higher than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Efficient and Effective Agency Operation: Deliver high quality, effective regulation of nonbank financial services by ensuring that the OCCC operates and performs at the highest standards of accountability, transparency, compliance, professional conduct and ethics, stewardship, and conservation of funds.
Objective:	Maintain a reasonable staff turnover rate and ensure actual expenditures do not exceed budgeted amounts.
Strategy:	Provide opportunities for career growth and professional development for OCCC employees. Engage in fiscal planning and budgeting that meets the needs of the agency while continuously monitoring expenses.

Outcome Measure: Percentage of regular employees separated from the agency (excluding retirements)

Definition

Total number of regular employee separations divided by the average number of employees, expressed as a percentage.

Purpose/Importance

This measure provides insight into the rate of employee turnover at the agency.

Source/ Collection of Data

This data is maintained by the State Auditor's Office.

Method of Calculation

The number of regular employees that separate from the agency during the period divided by the agency's headcount.

Data Limitations

Regular employees do not include interns, contract or temporary employees.

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Lower than target

Outcome Measure: Percentage of actual expenditures to budgeted expenditures.

Definition

Total amount of agency expenditures for the period divided by the amount budgeted or expenditures for the reporting period.

Purpose/Importance

This measure provides information on the fiscal responsibility of the agency.

Source/ Collection of Data

Agency quarterly financial statements.

Method of Calculation

Total amount of agency expenditures for the report period divided by the amount budgeted for expenditures for the reporting period.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Lower than target

Agency:	Office of Consumer Credit Commissioner
Goal:	Efficient and Effective Agency Operation: Deliver high quality, effective regulation of nonbank financial services by ensuring that the OCCC operates and performs at the highest standards of accountability, transparency, compliance, professional conduct and ethics, stewardship, and conservation of funds.
Objective:	Provide information requested from the agency in a timely and efficient matter to promote agency transparency to the citizens of Texas.
Strategy:	Respond to all requests made pursuant to the Texas Public Information Act (PIA) in accordance within the required time period and pursuant to all other statutory requirements.

Outcome Measure: Percentage of information requests addressed within 5 business days.

Definition

Total number of public information requests addressed either by response/closure, request for clarification, cost estimate, invoice, or referral to the Texas Attorney General's Office for a determination within 5 business days from the date of receipt of the request, divided by the total number of requests addressed during the reporting period.

Purpose/Importance

This measure provides input on the expeditiousness of the agency's response to public information requests and supports its goals of efficiency and transparency.

Source/ Collection of Data

Each PIA request received is logged into the PIR tracking spreadsheet including the Date Received. As the request progresses, dates are added to the spreadsheet to capture the following actions: Date Completed, Date Withdrawn, Clarification Requested, Invoice Sent, Referred to AG, Sent Cost Estimate, Clarification Received, Modification Received and Redaction Request sent. The PIR tracking spreadsheet automatically calculates the number of days to address each request using Excel formulas (the lowest action date is the Date Addressed, business days are counted between Date Received and Date Addressed). This number displays in the Business Days to Address column.

Method of Calculation

For all requests closed during the reporting period, count the number of requests with a Date Addressed of 5 days or less and divide that number by the total

number of requests closed during the reporting period.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Higher than target

Output Measure: Number of public information requests closed.

Definition

The number of all PIA requests closed during the reporting period. Does not include requests that were withdrawn.

Purpose/Importance

This measure provides information about how many requests were closed within a particular reporting period.

Source/ Collection of Data

Each PIA request received is logged into the PIR tracking spreadsheet and when the request is closed by any means other than withdrawal, the date of closure is added to the Date Completed column.

Method of Calculation

Count the number of requests closed during the reporting period using the Date Completed.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Higher than target

Output Measure: Number of public information requests withdrawn.

Definition

The number of PIA requests withdrawn either by the requestor or by operation of law.

Purpose/Importance

This measure provides information about how many requests were withdrawn within a particular reporting period.

Source/ Collection of Data

Each PIA request received is logged into the PIR tracking spreadsheet and if the request is withdrawn either by operation of law or by the requestor, the date of withdrawal is added to the Date Withdrawn column.

Method of Calculation

Count the number of requests closed during the reporting period using the Date Completed.

Data Limitations

None

Calculation Type

Cumulative

New Measure

Yes

Desired Performance

Lower than target

Efficiency Measure: Average number of days to address a public information request.

Definition

Total number of days for all requests to be addressed either by response/closure, request for clarification, cost estimate, invoice, or AG referral divided by the total number of days to address all requests.

Purpose/Importance

This measure provides input on the expeditiousness of the agency's response to public information requests and supports its goals of efficiency and transparency.

Source/ Collection of Data

Each PIA request received is logged into the PIR tracking spreadsheet including the Date Received. As the request progresses, dates are added to the spreadsheet to capture the following actions: Date Completed, Date Withdrawn, Clarification Requested, Invoice Sent, Referred to AG, Sent Cost Estimate, Clarification Received, Modification Received and Redaction Request sent. The PIR tracking spreadsheet automatically calculates the number of days to address each request using Excel formulas (the lowest action date is the Date Addressed, business days are counted between Date Received and Date Addressed). This number displays in the Business Days to Address column.

Method of Calculation

For all requests closed during the reporting period, total the Business Days to Address and divide by the number of requests closed.

Data Limitations

None

Calculation Type

Cumulative

	New Measure Yes	Desired Performance Lower than target
Explanatory Measure:	<p>Number of public information requests received.</p> <p>Definition The number of public information requests received during the reporting period.</p> <p>Purpose/Importance This measure provides an understanding of the volume of requests received by the agency.</p> <p>Source/ Collection of Data Each PIA request received is logged into the PIR tracking spreadsheet including the Date Received.</p> <p>Method of Calculation Count the number of requests received during the reporting period.</p>	
	Data Limitations None	Calculation Type Cumulative
	New Measure Yes	Desired Performance Lower than target

Schedule C: Historically Underutilized Business Plan

The Office of Consumer Credit Commissioner (OCCC) is committed to a good faith effort to increase purchases from and contract awards to Historically Underutilized Business (HUB) firms consistent with the State's goals for HUB participation and overall economic development.

Program Goals

The function of the State HUB Program is to assist certified minority and woman-owned businesses in bidding for contracts and open market purchases with Texas State agencies, including institutions of higher education. HUB owners represent economically disadvantaged persons of a qualifying group (Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans, American Women, and Disabled Veterans). The OCCC is committed to maximizing the opportunity for HUB firms to provide goods and services needed to support the agency.

Through the implementation of this program, the agency commits to fostering an environment to meet or exceed the State's annual percentage goals for HUB participation in purchases of and contracts for the following procurement categories:

- 11.2% Heavy Construction (other than building contracts)
- 21.1% Building Construction
- 32.9% Special Trade Construction
- 23.7% Professional Services
- 26.0% Other Services
- 21.1% Commodities

Objectives

- Establish administrative policies and procedures necessary for efficient and effective management control of the HUB program;
- Enhance the ability of HUBs to compete for contracts and purchases;
- Encourage HUBs to participate in the competitive bid process with the objective of increasing the number of contracts awarded to HUB suppliers; and
- Strive to meet the State's six (6) category goals of eligible contracts awarded to HUBs to the extent that the agency has purchases within the respective categories.

Strategies

- Create an environment to adequately manage the HUB program
- Identify Reporting Requirements
- Participate in HUB procurement workshops and seminars

Output Measures

- Number of HUBs contractors and subcontractors contacted for bid proposals
- Number of HUBs contracts and subcontracts awarded
- Dollar value of HUB contracts and subcontracts awarded

Schedule D: Statewide Capital Plan

NOT APPLICABLE

Schedule E: Health & Human Services Strategic Plan

NOT APPLICABLE

Schedule F: Agency Workforce Plan

Agency Strategic Direction

The mission of the Office of Consumer Credit Commissioner (OCCC) is to regulate non-depository financial services and to educate consumers and industry providers, fostering a fair, lawful, and healthy financial services market that grows economic prosperity for all Texans. The OCCC recognizes the need for a healthy financial services environment and seeks to achieve a balance between consumer protection, access to financial services, and the profitable operation of financial service providers in Texas. The OCCC promotes the highest principles of professional conduct and ethics, diversity, and stewardship and conservation of funds while engaging in limited, balanced, and effective regulation.

The OCCC licenses and regulates non-depository financial service providers using the following four-part philosophy:

- **Regulate** fairly, efficiently, and effectively, balancing the needs of both consumers and financial service providers by enforcing Texas credit laws and licensing qualified financial service providers;
- **Educate** consumers about rights, responsibilities, and remedies; and financial service providers about rights and responsibilities;
- **Communicate** collaboratively with and encourage communication among the financial services industry, consumer public, and the OCCC; and
- **Protect** and safeguard consumers against abusive, unfair, and deceptive lending practices.

The OCCC is divided into five functional areas: Consumer Assistance; Consumer Protection; Licensing and Registration; Financial Education; and Administration and Legal.

The agency has identified the following four strategic goals for the 2021-2025 planning period:

- A. Protect consumers from abusive and deceptive practices, fraud, and misrepresentation through prompt, fair, and effective enforcement of applicable state and federal statutes and regulations.
- B. Provide a high quality and efficient licensing and registration process that maintains high standards for licensed or registered financial service providers and promotes a transparent, fair, and competitive financial services market.
- C. Educate consumers about their rights, remedies, and responsibilities. Encourage communication and cooperation among the nonbank financial services industry, the consumer public, and the agency. Promote the Texas Financial Education Endowment (TFEE) to support statewide financial capability and consumer credit building activities and programs.
- D. Deliver high quality, effective regulation of nonbank financial services by ensuring that the OCCC operates and performs at the highest standards of accountability, transparency, compliance, professional conduct and ethics, stewardship, and conservation of funds.

The industries regulated by the OCCC operate within a dynamic financial service marketplace that adjusts to evolving products and business practices, market pressures, and changes in federal, state, and

municipal regulation. The degree to which these influences will affect the OCCC's regulated population may vary and may contribute to changes affecting the agency's staffing needs.

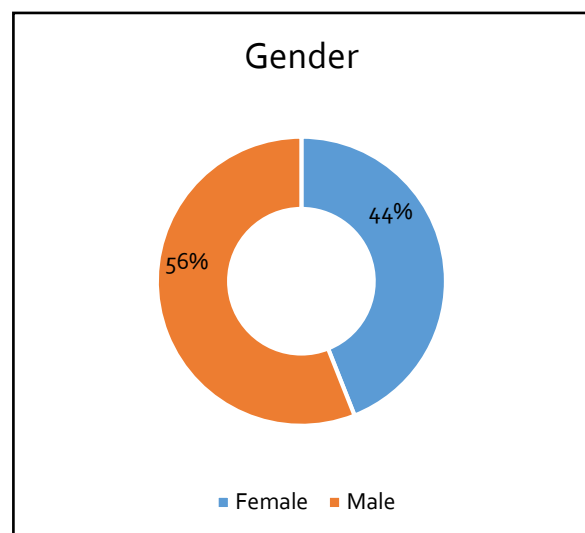
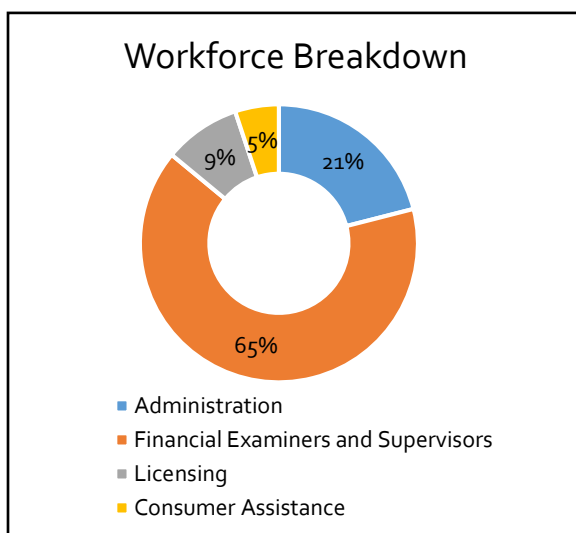
The OCCC seeks to recruit, develop, and retain employees with the skills and competencies required to support its strategic goals. The agency will adjust staffing strategies to complement changes within the industries it regulates to ensure the agency performs its core functions effectively and efficiently. The OCCC has placed an emphasis on employee retention through professional development, career progression, and competitive salaries. The OCCC also recognizes the need for increased staff cross-functionality and succession planning.

Workforce Analysis

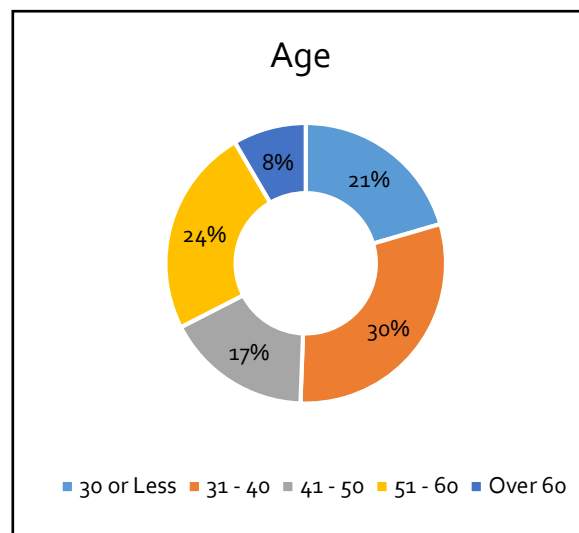
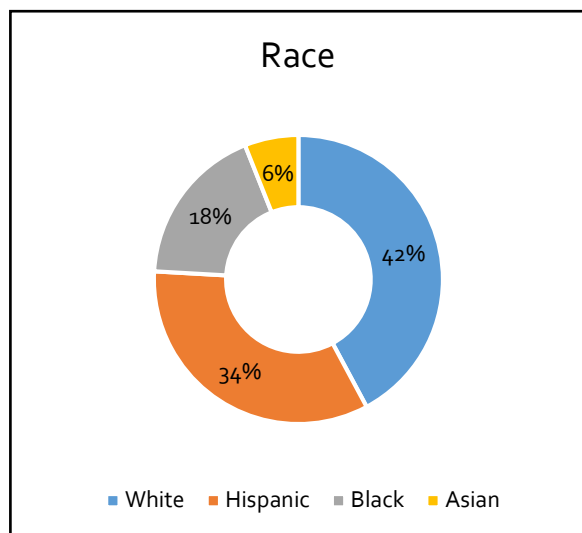
Current Workforce Profile

As a small state agency, the importance of developing and retaining qualified staff at all levels of the agency is paramount to the agency's continued success and operation. The OCCC invests significantly in the training and development of its Consumer Protection staff, which consists of field examiners, field supervisors, financial analysts, managers, and administrative personnel. The OCCC develops and provides robust training and professional development for its examiners to promote opportunities for career advancement. The OCCC places a priority on the professional development of all staff members and is committed to developing a workforce that is prepared to respond and adapt to the dynamic nature of the financial service and consumer credit marketplace.

The OCCC is authorized to employ 91 full-time employees (FTEs). As of February 29, 2020, the OCCC staffed 78.5 FTEs. Currently, 32.5 FTEs work at the OCCC's Austin headquarters, and the remaining 46 work in various regions throughout the state. The staff is comprised of financial examiners, attorneys, licensing and permit specialists, accountants, investigators, other professionals and support personnel.



Fifty-six percent of OCCC staff identify as male, and 44% identify as female. Overall, 48% of employees have been with the agency more than five years, 23% have been with the agency between 2-5 years, and 29% have been with the agency less than 2 years. The median age of agency employees is 40 and the average age is 42.



Retirement Eligibility

Although 19% of the OCCC's staff is eligible for retirement within the next five years, the agency does not anticipate retirement will account for a majority of separations in the immediate future. Effective implementation of strategies related to succession planning, recruitment, retention, staff development, and general sharing of the agency's knowledge bases are vital to the agency's continued effectiveness, continuity, and adaptability.

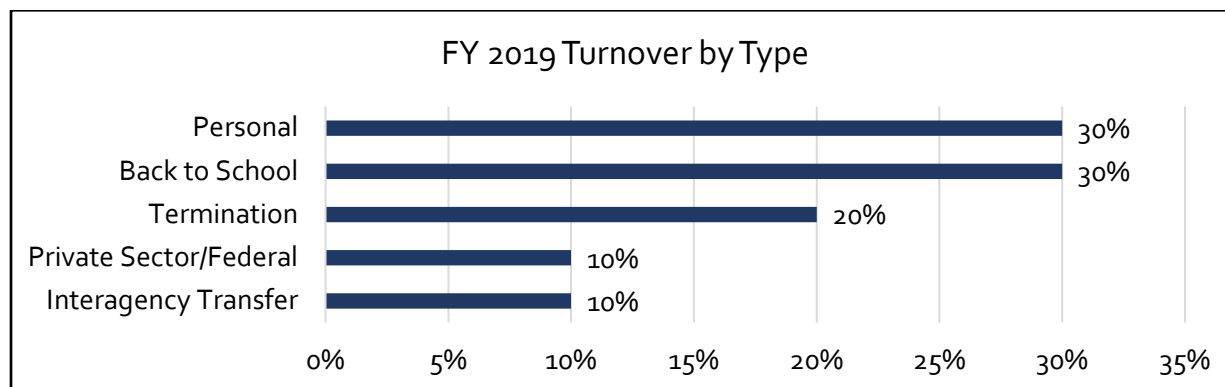
Staff Turnover

The OCCC competes with non-depository financial service providers, other state agencies, and federal regulatory agencies for its professional staff, especially within the financial examiner occupational series.

As a small state agency, the retention of qualified staff at all levels of the agency is vital to the agency's continued success. The OCCC seeks to limit turnover throughout all its functional areas, with particular focus on retention of financial examiner staff due to the significant investment in training for these staff members.

The OCCC seeks to maintain an acceptable turnover ratio to limit the effects of staff change. Many factors and conditions affect an agency's turnover ratio, such as employment market conditions that may drive higher turnover from time to time. A reasonable turnover ratio for this agency is between 10-15%. The agency has seen the turnover rates over the last 5 years vary from a high of 24% in 2013 to a low of 12% in fiscal year 2017. The agency turnover rate remained below the state average, 20%, in 2019. Fiscal

year 2019 separations were primarily split between “Personal” and “Back to School” opportunities. Of those separations, the majority of those employees had between 2 and 5 years of service.



Financial Examiners represented six of the 16 separations in fiscal year 2019. The financial examiner series represents the largest component of the agency’s workforce and is the most expensive to the agency in terms of replacement costs. The OCCC provides specific professional training to individuals selected for these positions concentrated during the first three years of employment - activities that represent significant monetary and time commitments by the agency.

The OCCC must continue its efforts to minimize turnover within the lower financial examiner levels. Historically, the OCCC has experienced the highest levels of turnover within the Financial Examiner I and II levels. This may be attributed to the nature of work of the position, an individual not being a good fit for the position, or travel requirements. During the first half of fiscal year 2020, three financial examiners departed with more than five years of service with the OCCC. The OCCC continues to strengthen its retention efforts for financial examiners. In FY 2019, a total of twenty-nine merit increases or promotions were awarded within the Financial Examiners series. More than half of those were awarded within the 2-5 year longevity group. Mentoring, cross-training opportunities, and career ladder progressions are key strategies to improve examiner retention. The OCCC will continue to focus on market competitiveness, effective recruitment and selection strategies, and retention to continue to keep turnover lower than the state average.

The OCCC continues to identify possibilities to reduce travel and encourage team approaches for its financial examiners, as well as providing for work/life balance across all departments in the agency including flexible schedules and telecommuting. Continued improvements relating to infrastructure, functionality of office space, and better use of technology have created additional enhancements for work processes conducted by a growing, mobile and dispersed workforce.

The list below highlights the workforce skills critical to the mission and goals of the OCCC including knowledge of or experience in:

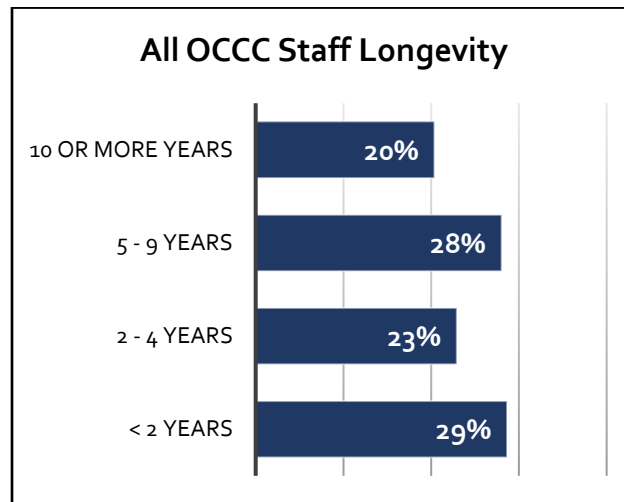
- Examination procedures and related state and federal financial protection laws for non-depository financial services entities covering multiple products and services
- State and federal regulatory controls, statutes, and administrative codes related to non-depository financial service products
- Analysis and reporting tools related to financial data and consumer financial products
- Corporate structures, business operating procedures, management control, and internal reporting techniques
- Financial industry terminology and practices
- Economic and accounting principles
- Statistical analysis and techniques
- Financial reports and reporting structures or mechanisms
- Training procedures and techniques
- Information Technology examination or auditing

Future Workforce Profile

Economic and environmental factors facing the OCCC's staff over the next five years include: repercussions of the COVID-19 pandemic on industries and consumers, turnover and retention of financial examiners, and retirement-eligible employees. During fiscal year 2019, the OCCC continued to experience the impact of these effects with four financial examiners departing the agency.

Competition with the private sector as well as with regulatory agencies such as the Consumer Financial Protection Bureau (CFPB) is expected to increase and retention of these individuals is vital to the effectiveness of the OCCC's regulatory programs. The OCCC regularly reviews its in-house training as well as external development opportunities and curricula to provide specific training related to regulated industries. A career ladder and progression program allowing for movement within levels I through III of the financial examiner series is providing opportunities for field examiners to participate in projects and team-based work (e.g. out-of-state examinations) to further develop competencies and skill sets. The goal of the OCCC is to recruit and select quality candidates for entry-level financial examiner positions, to consistently and effectively develop those candidates for increased scope of responsibility, and to identify those who may be developed for future supervisory and leadership roles. The OCCC emphasizes the need to incentivize and retain those examiners within two to five years of agency service; to utilize them to assist in the training and development of entry-level examiners; and to integrate identified candidates into succession planning. It is the goal of the OCCC for at least 50% of its full-time employee staff to have agency longevity of at least five years. As of the middle of fiscal year 2020, 48% of OCCC have worked with the agency at least five years. The chart below represents longevity within the agency as of February 29, 2020. Financial examiner longevity mirrors that of the agency as a whole.

Assessing and determining the future requirements for the agency's workforce encompasses a broad range of duties, needed competencies and skills, and programmatic concerns. These issues have been identified through the agency's strategic planning process, interaction with industry stakeholders, and discussions with OCCC staff members. As the OCCC adapts to a dynamic and evolving financial services marketplace, it will need qualified staff that can be developed to serve the industry and consumers in Texas.



Expected Workforce Dynamics

- Increased use of technology to provide service and maximize efficiency.
- Increased use and development of subject matter experts.
- Increased investigations into unlicensed businesses.
- Increased communication, collaboration, and partnerships with external stakeholders
- Increased number of public information requests
- Increased generational shift
- Increased number of Veterans eligible for work

Critical Functions

- Increased examination activity in response to the growth and evolution of financial services.
- Increased collaboration with federal and state regulators.
- Increased collaboration with industry stakeholders.
- Increased demand in supervisory resources due to larger workforce and increased number of examinations.
- Increased review of electronic and web-based financial services and the use of information technology at the regulated entity level.
- Increased cybersecurity awareness and training throughout agency.
- Development and retention of qualified professionals.
- Development and implementation of effective succession plans.

Gap Analysis

As the OCCC's regulated population evolves, adjustments to the agency's workforce plan will be made through the addition, deletion, or realignment of positions and responsibilities. The agency's SDSI status enables it to respond to changes in the regulatory environment in a well-timed manner. The OCCC uses this flexibility to recruit and retain financial examiners in a highly competitive market, in the face of direct competition of a federal financial regulator. It has decreased turnover and allowed the OCCC to respond to dramatic growth in regulated industries, such as the motor vehicle sales finance industry. Further, it provides the OCCC with flexibility to expand or diminish its resources in response to economic conditions.

The OCCC has effectively demonstrated an ability to evaluate vacancies and streamline operations without affecting the productivity of the entire agency.

Depending on the fluctuation of the regulatory environment, the OCCC does not anticipate the need for additional FTEs to continue fulfilling the mission of the agency and to provide the level of customer service that is expected for consumers, licensees, and other stakeholders. Regulatory concerns and workload are often countercyclical and can mount during periods of economic weakness or instability. The required regulatory response to these conditions may necessitate an increase in staffing and experienced personnel.

Strategy

The OCCC's goal is to retain its professional workforce and to meet the special needs described above. Future changes in the organizational structure may be necessary to respond to changing workloads or new initiatives to ensure that the mission of the OCCC is accomplished efficiently. The OCCC will continue to utilize a wide range of recruiting sources to secure the maximum number of qualified applicants, including minorities and women, for available positions within all classifications.

The OCCC will also continue to maintain and hone its career ladder and provide on-the-job training and in-house programs for employees and, when possible, provide funding for workshops, seminars, and other programs offered by universities, other agencies, and private entities to develop leadership and career development.

Training opportunities for staff remain a high priority for the OCCC. Cooperative state training opportunities are a valuable method for knowledge enhancement and the OCCC will continue to make substantial efforts to utilize these tools. These cooperative training opportunities allow staff to learn about important subject matter while working with their counterparts in other states.

Succession planning will remain an ongoing process of recruitment, retention, methodical development of required skills through training and experience, cross training, and careful evaluation of individual job performance. This will maintain the depth of skilled personnel at key positions on the OCCC's career ladder necessary to ensure continuation of the efficiency and effectiveness of the OCCC. Preparing qualified staff to carry on the roles of senior management and leadership will require specialized training,

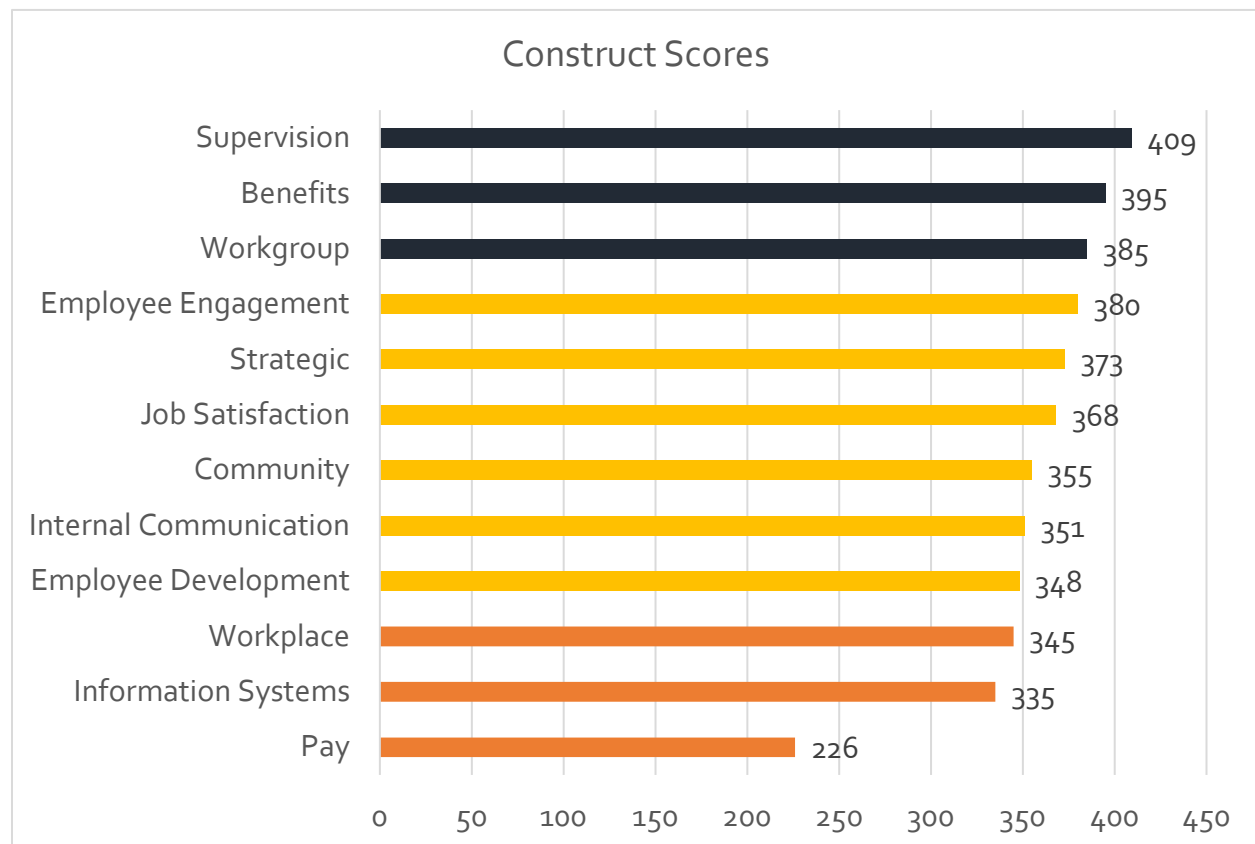
internal development through mentoring and project assignment, and other educational opportunities to develop technical and managerial skills.

Employee Engagement

The OCCC participates in a biannual Survey of Employee Engagement (SEE) administered by the Institute for Organizational Excellence at the University of Texas at Austin. In November 2019, surveys were emailed to 79 employees statewide. Sixty-eight surveys were completed, resulting in an 86% response rate. Survey findings were made available to the agency in December 2019.

This OCCC's 86% response rate is considered high, and is on par with the response rate from its last SEE. High rates indicate that employees have an investment in the organization and are willing to contribute towards making improvements within the workplace. The OCCC's overall score of 361 was higher than its previous score of 350. Scores above 350 are desirable, and when scores dip below 300, there may be cause for concern.

The survey evaluates employee engagement within 12 constructs or organizational topics. Based on these constructs, 44% of OCCC staff are either highly engaged or engaged. According to nationwide polling, about 30% of employees are either highly engaged or engaged. The following table shows the OCCC's scores for each construct on a scale of 100 to 500. Scores above 350 indicate positive perceptions.



Schedule G: Workforce Development System Strategic Planning

NOT APPLICABLE

Schedule H: Report on Customer Service

The Office of Consumer Credit Commissioner (OCCC) developed a series of web-based Customer Satisfaction Surveys to gather input on the following six areas: Consumer Assistance, Examination, Financial Education/Texas Financial Education Endowment (TFEE) Grant Administration, Legal, Licensing and Registration, and Public Information.¹ The survey instruments evaluated the respondent's satisfaction with each particular area, the agency's website, the agency's online portal (ALECS), and the agency as a whole. The OCCC identified survey participants who had contact with the agency in one of the six areas within the past six months. The participant pool included OCCC licensees and registrants, consumers, and members of the public. The chart below describes the participant selection criteria.

Area	
Consumer Assistance	Complainants and Businesses who filed a complaint or had a complaint filed against them between September 1, 2019, and February 29, 2020.
Examination	Licensees whose examination report was finalized between September 1, 2019, and February 29, 2020.
Financial Ed. / TFEE	All recorded contacts, grant applicants and grant recipients with agency contact between September 1, 2019, and February 29, 2020.
Legal	Any business or individual with an enforcement action issued against them by the OCCC, whose case was closed between September 1, 2019, and February 29, 2020.
Licensing & Registration	Any business or individual whose new license request or amendment was approved, denied or withdrawn between September 1, 2019, and February 29, 2020.
Public Information	Individuals whose public information request was completed between September 1, 2019, and February 29, 2020.

The surveys opened on March 5-6, 2020, and closed on March 31, 2020. The OCCC sent an initial email to each participant when the surveys opened, and a reminder five days before the survey closed. The emails included a link to the survey that corresponded to the individual's interaction with the agency. The OCCC invited 3,768 individuals to complete the survey, and received an overall 11% response rate with 398 completed surveys.

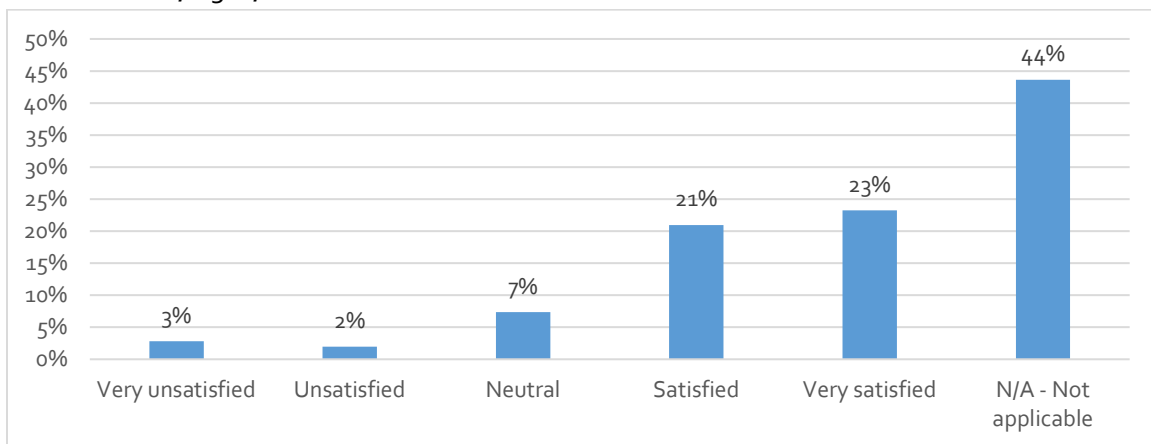
¹ This Report on Customer Service is provided pursuant to Chapter 2114 of the Texas Government Code.

OCCC 2020 Customer Satisfaction Surveys						
Area Surveyed	Consumer Assistance	Examination	Financial Ed. / TFE	Legal	Licensing & Registration	Public Information
No. Invitations	600	769	105	561	1669	64
No. Responses	74	100	7	31	172	14
Response Rate	12%	13%	7%	6%	10%	22%

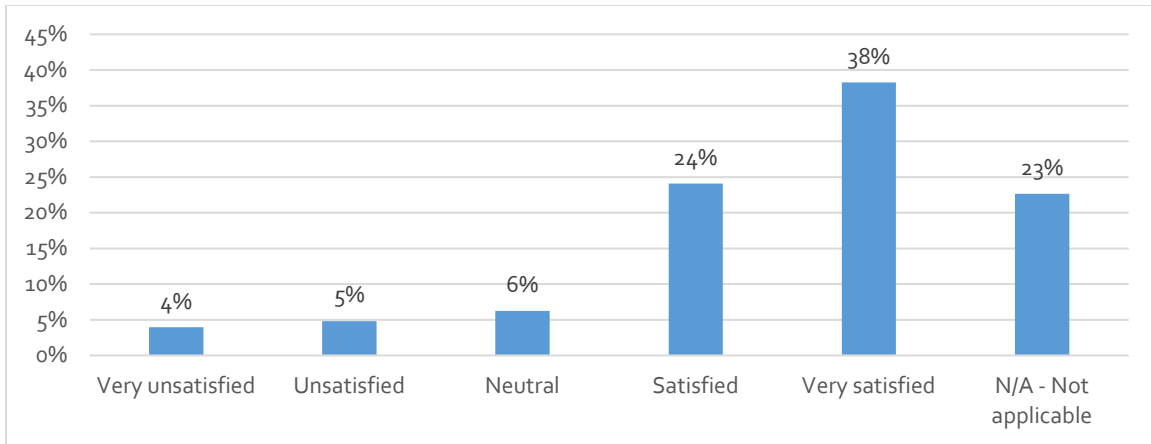
Required Survey Questions and Responses

Instructions for the 2021-2025 Strategic Plan included a prescribed customer service survey consisting of eight questions and a scale rating from very unsatisfied to very satisfied. These eight survey questions were included in each of the OCCC's six survey instruments described above. In response to all eight questions, the majority of respondents indicated they were either satisfied or very satisfied with the OCCC. Following are the OCCC's survey results:

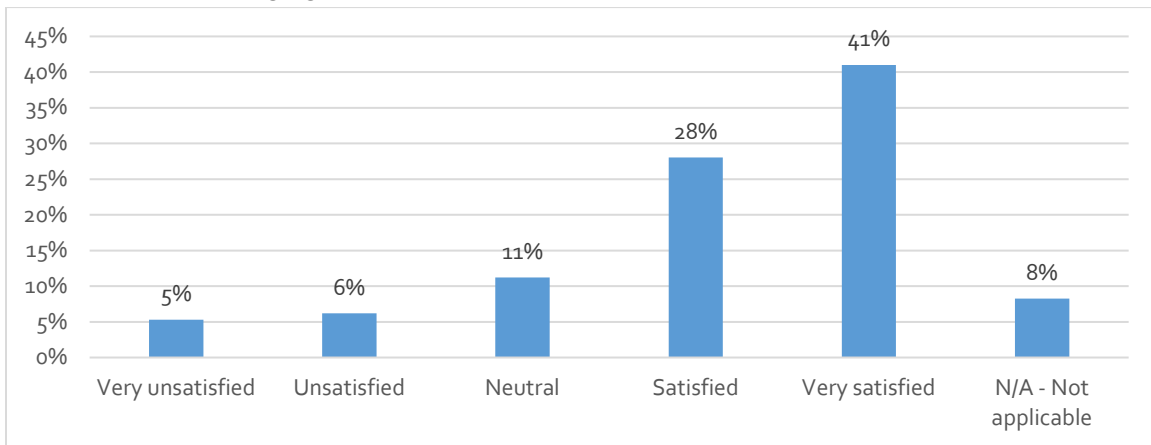
1. How satisfied are you with the agency's facilities, including your ability to access the agency, the office location, signs, and cleanliness?



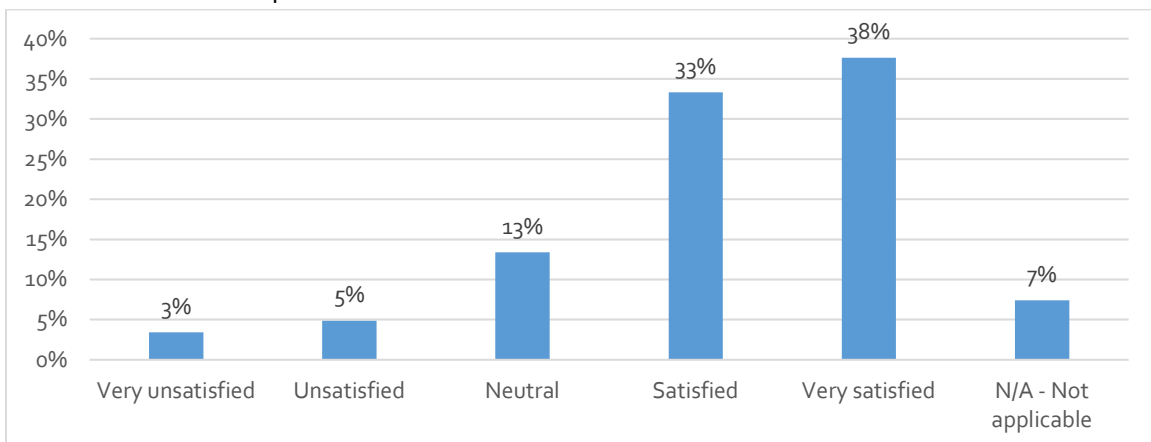
2. How satisfied are you with agency staff, including employee courtesy, friendliness, and knowledgeability, and whether staff members adequately identify themselves to customers by name, including the use of name plates or tags for accountability?



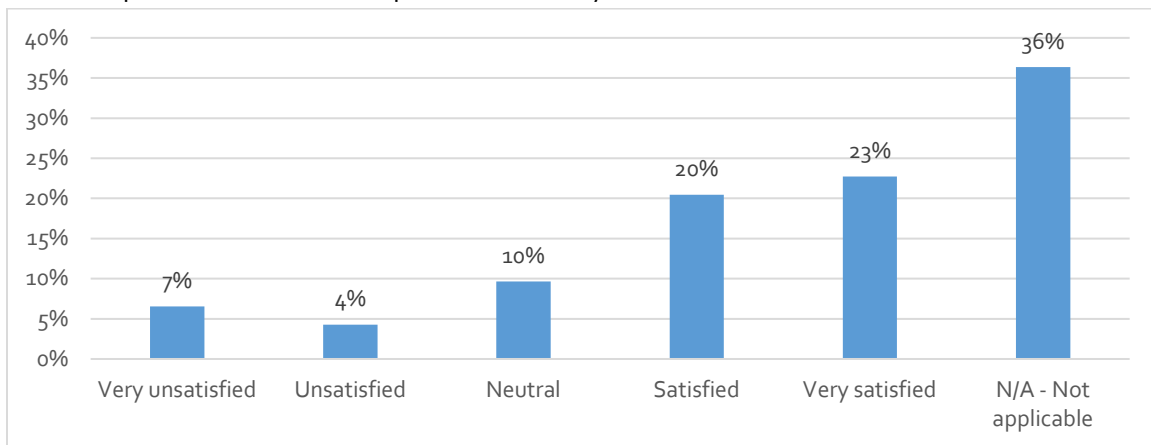
3. How satisfied are you with agency communications, including toll-free telephone access, the average time you spend on hold, call transfers, access to a live person, letters, electronic mail, and any applicable text messaging or mobile applications?



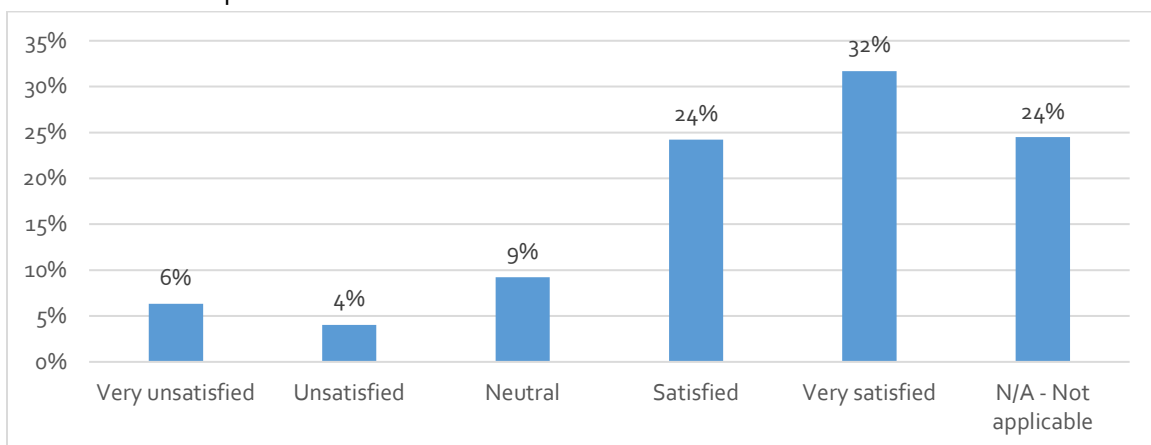
4. How satisfied are you with the agency's internet site, including the ease of use of the site, mobile access to the site, information on the location of the site and the agency, and information accessible through the site such as a listing of services and programs and whom to contact for further information or to complain?



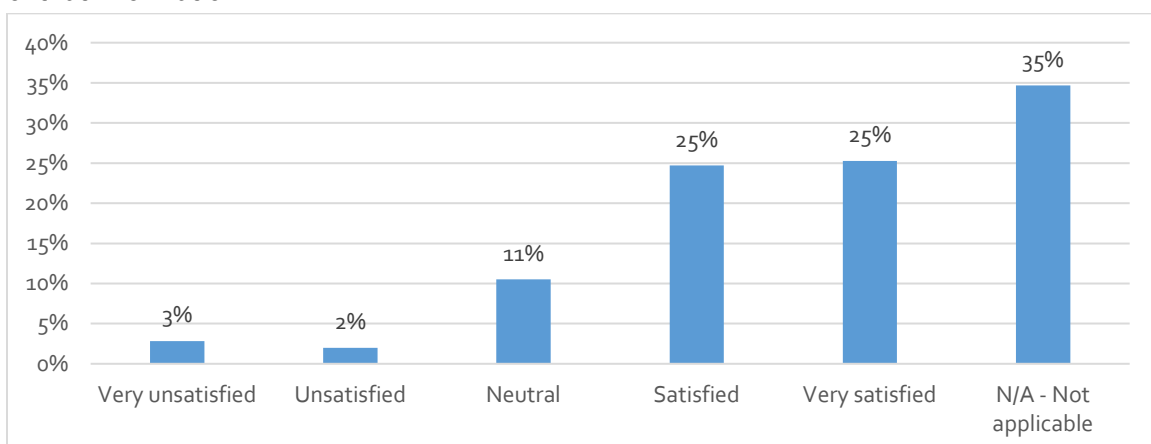
5. How satisfied are you with the agency's complaint handling process, including whether it is easy to file a complaint and whether responses are timely?



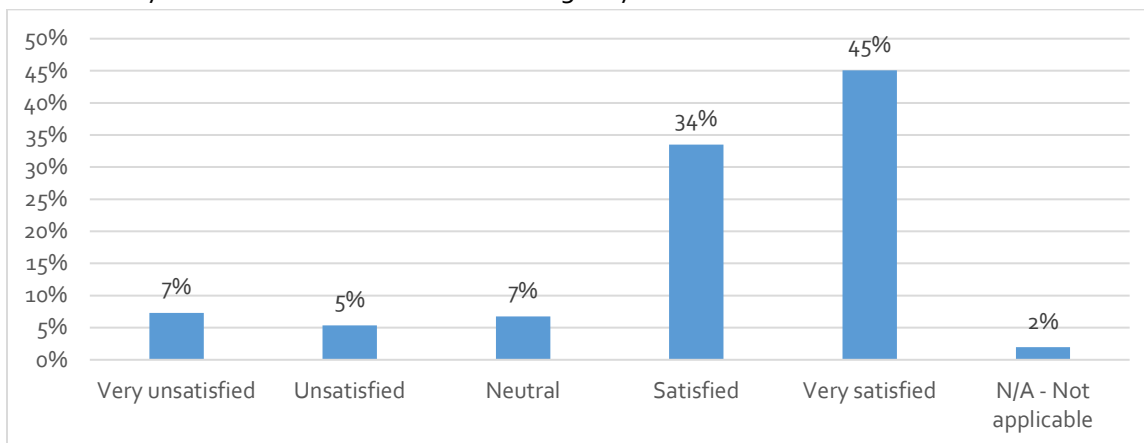
6. How satisfied are you with the agency's ability to timely serve you, including the amount of time you wait for service in person?



7. How satisfied are you with any agency brochures or other printed information, including the accuracy of that information?



8. Please rate your overall satisfaction with the agency.



Analysis of Findings

The OCCC is committed to providing quality customer service throughout its service areas. A survey is one tool the OCCC uses to gauge stakeholder satisfaction. OCCC staff regularly engage with stakeholders (consumers, regulated industry representatives, and members of the public) in person, on the phone, and through electronic communications, and feedback is encouraged. The OCCC saw a 45% drop in survey respondents compared to 2018. The survey response rate varied from 6% to 22% between the service areas, with an average response rate of 11%. The wide variance between the service areas and the limited response generally, may skew the analysis of the response data. Lower response rates may yield results that reflect the feelings of only those with the most positive or negative impressions of their experience.

The survey results show a general overall satisfaction with the agency, with 79% of respondents rating overall satisfaction as satisfactory or very satisfactory. Five of the agency's six service areas received overall satisfaction ratings of over 70%, with the Examination and Financial Education/TFEE areas scoring 99% and 100%, respectively. In addition to overall satisfaction in each area, respondents provided input on staff accessibility, professionalism, courteousness, thoroughness, timeliness, knowledge and clarity of communication. The OCCC's Examination area received the highest percentage of positive ratings in these categories. The OCCC's Consumer Assistance area showed the lowest ratings.

The OCCC's examination staff operate mostly in the field, visiting businesses and reviewing transactions for compliance. These individuals engage in the majority of the OCCC's in-person interactions. Respondents expressed continued satisfaction with the OCCC's examination area. Overall satisfaction in this area rose from 89% in 2018 to 99%. Examiners are generally considered professional, courteous, and knowledgeable of current industry issues. Ninety percent of respondents agreed that exams are conducted without placing an undue burden on their company, and 93% agreed that examinations take place in a reasonable amount of time.

The consumer assistance area received the lowest overall satisfaction ratings. This area of the agency receives and processes complaints filed against industries regulated by the OCCC and works towards an amicable outcome for the consumer and the financial service provider. The majority of communications with complainants and the businesses complained against occur by phone, email, mail, and the OCCC's online portal, ALECS. The consumer assistance area received 811 complaints between September 1, 2019, and February 29, 2020. The work of this team is difficult and the OCCC is continually working to improve performance in this area through training and staff retention programs.

The OCCC's licensing staff evaluate license applications for completeness and capability, and interact with applicants and licensees primarily through phone and email communication, and the OCCC's online portal, ALECS. Thirty-eight percent of respondents indicated that they interacted with this area for the purpose of applying for a new license. Respondents' ratings of licensing staff accessibility, professionalism and courteousness, informative responses to inquiries and requests, and overall satisfaction were all 80% or higher. Licensing staff communicate professionally and courteously according to 84% of respondents. The Licensing and Registration area scored lowest in the area of website communication, with only 67% of respondents agreeing that the website provides clear instructions on how to properly complete and submit applications.

The OCCC solicited additional input on its website across all six survey areas. Thirty-four percent of respondents accessed the OCCC website one to two times within the past 6 months. The top three categories of information sought included: 1) licensing and registration information and instructions; 2) annual or quarterly reporting instructions; and 3) complaints or concerns. Seventy-one percent of respondents rated the website satisfactory or very satisfactory. The OCCC has a website committee that is currently working to improve the contents and functionality of the site.

For the first time, the OCCC solicited feedback on its public information area. This area, Financial Education/TFEE and Legal each received fewer than 35 responses. While the majority of respondents expressed satisfaction with these areas, the limited responses make it difficult to draw any distinct conclusions in these areas.

The OCCC has made a significant investment in its online portal, ALECS. Through ALECS, businesses can submit license and registration applications, transfer or relocate a license, review examination reports, respond to complaints, and manage their contact information. Consumers can use ALECS to file a complaint, and to search for businesses licensed and registered with the OCCC. Because ALECS is such an important part of how the agency conducts its business, the OCCC included specific survey questions in the Consumer Assistance, Examination, and Licensing & Registration surveys related to satisfaction with ALECS. The majority of respondents, 74%, had used ALECS within the past 6 months. Sixty-six percent of respondents indicated that they were satisfied (positive experience) with ALECS, and 79% of respondents indicated it was easy to navigate. Over a dozen respondents included additional comments on the survey specifically about ALECS. The OCCC welcomes this feedback and the opportunities for continuous improvement of this vital system.

The OCCC provided opportunities for respondents to provide comments and to request a response from the agency. These comments included many compliments of agency staff and processes, and suggestions for improvement. Making major changes based on small data inputs is challenging. The agency is looking for ways to survey more regularly over a longer period in an effort to gain a better and more comprehensive picture of the opinions of its customers and stakeholders.

Outcome Measure

Percentage of Surveyed Customer Respondents Expressing Overall Satisfaction with Services Received:
79%

Output Measures

Total Customers Surveyed: 3,768

Response Rate: 11%

Total Customers Served: 3,768 (within the 6-month survey period)

Efficiency Measure

Cost per Customer Surveyed: less than \$.25 (The OCCC uses a paid subscription to Survey Monkey and staff developed and sent out the surveys.)

Explanatory Measures

Total Customers Identified: 3,768

Total Customer Groups Inventoried: 6