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July 2, 2014

This is in response to your Freedom of Information Act request dated June 25, 2014, received in my office on June 25, 2014.

You requested requesting a copy of the Comptroller of the Currency Style Manual.

Your request has been granted.

Sincerely yours,

Rosalie Settles

Rosalie Settles
Freedom of Information Act Specialist
Disclosure Services

#2014-00437-F

The OCC Style Manual



2011

Revised May 2014

The OCC Style Manual

Office of the Comptroller of the Currency
Communications Division
(202) 649-6700

Key

Abbreviations are alphabetized as if they were words.

Entries are in **boldface** merely to make them easy to find.

Words *italicized* in entries are only key words; they are not meant to be italicized in writing, unless specified.

For items not covered in this manual, consult *The Chicago Manual of Style*. For guidance on spelling, consult *Merriam-Webster's Collegiate Dictionary* or *Webster's Third New International Dictionary, Unabridged*. See spelling for more information on spelling.

Authors and editors should not follow this style manual when working with *Federal Register* documents and interagency documents. Writing or editing *Federal Register* documents requires adherence to the *U.S. Government Printing Office Style Manual*. Editing interagency documents (other than those written by the OCC) requires adherence to the style dictated by the authoring agency.

Please direct any questions to the Publishing Services Unit staff or e-mail OCC_StyleManual@occ.treas.gov.

A

a, an When preceding abbreviations, write *an* MBS (mortgage-backed security) rather than *a* MBS (because one would say *an em* rather than *a em*); *an* FDIC examiner rather than *a* FDIC examiner (because one would say *an eff* rather than *a eff*).

ABA American Bankers Association.

abbreviation An abbreviation is a shortened form of a phrase or word that is not pronounced like a word (*OCC, dept.*). Include the all-caps abbreviation of a term in parentheses following the term's first mention in body text if the term is used again in the publication; it is not necessary to add the abbreviation if the term is used only once. If the term is used only twice and in the same sentence, put the abbreviation in parentheses after the first mention and then use the abbreviation as the second mention, or do not include the abbreviation and rewrite around the second mention. If the phrase and abbreviation are first mentioned in a footnote, they should both be repeated in the first mention in body text. If the abbreviation has been used before, it can be used in appendixes.

The Office of the Comptroller of the Currency
(OCC) must do everything in its power to ensure
the health of the federal banking system.
Loans greater than \$1 million may qualify as
community development (CD) loans if they
meet the CD definition.

Keep abbreviations to a minimum and paraphrase on second reference instead if an abbreviation is infrequently used.

The OCC's financial statements are prepared from the agency's accounting records in conformity with principles set forth by the Federal Accounting Standards Advisory Board. ... The advisory board [not *FASAB*] issued new rules effective September 30, 2011.

Even if the first mention is plural, as in *money market funds*, the parenthetical abbreviation would be singular: *MMF*. Spell out the first mention in a title or subtitle if it hasn't already been used in body text, but do not put the abbreviation there—add it after the full name's first mention in body text. Do not use periods in all-caps abbreviations, except in *U.S.*, *U.K.*, and *U.N.*

To make an abbreviation plural, add a lowercase *s*. Do not add an apostrophe.

No: BS's

Yes: BSs

If the spelled-out phrase is preceded by *the*, the abbreviation should be preceded by *the*, too.

The Federal Deposit Insurance Corporation (FDIC) preserves and promotes public confidence in the U.S. financial system. The FDIC insures deposits in banks and thrift associations for at least \$250,000.

See acronym; a. an; initialism; state names.

academic degrees Unless a degree follows a name, the degree should not be capitalized.

Louise Foote, Doctor of Podiatry
associate degree
bachelor's degree
bachelor of science
master's degree
master of business administration
master's in business administration
doctorate

accent marks Do not omit them from foreign words.

Accounting Standards Codification See ASC.

ACH automated clearing house.

acronym An acronym is a shortened form of a phrase or organization name that is pronounced like a word, whether composed of the first letters of a series of words or of parts of the words. Include the acronym in parentheses following the term's first mention if the term is used again in the publication; it is not necessary to add the acronym if the term is used only once, unless the second reference is in the same sentence. Never add an *s* to make an acronym plural. An acronym is not preceded by *the* even if *the* precedes the full name of the term, because it is pronounced like a word.

Alcoa (Aluminum Company of America)
NOW (negotiable order of withdrawal)
WAM (weighted average maturity)

See abbreviation, initialism.

act Uppercase *act* when it is part of an act's proper name.
Lowercase the plural *acts*, even when it is part of the acts' names.

Community Reinvestment Act
Fair Lending and Community Reinvestment acts

Lowercase *act* when it is used as a second reference to a previously mentioned act.

The Community Reinvestment Act was passed in 1977. The act was signed into law by President Jimmy Carter.

active voice See voice.

actual, actually These words often are redundant.

ADC Assistant Deputy Comptroller.

addendums The plural of *addendum*.

addresses In body text, spell out *street, avenue, road, etc.*, whether it is part of a complete address or not, and use Associated Press abbreviations for states (see state names). Do not use a comma before or periods in compass directionals in either case.

The meeting was held at the OCC's Western District Office at 1225 17th Street, Denver, Colo.
The parade went down Pennsylvania Avenue NW.

In mailing addresses, abbreviate *street, avenue, road, etc.*, and use postal abbreviations for states (see state names).

1225 17th St., Denver, CO 80202

adequate(ly) This word sometimes is redundant. In the following example, it can be deleted.

Redundant: You must decide whether the compliance management system adequately ensures compliance.

If something ensures compliance, it is adequate.

administration Lowercase when referring to a political administration.

the Clinton administration

advocate *Advocate* rather than *advocate that*.

No: He advocated that the auditors be changed.

Yes: He advocated a change in auditors.

affect (verb), effect (noun, verb) *Affect* means to influence.

The scandal affected the election's outcome.

An *effect* is a result or an outcome.

The scandal had a great effect on the election's outcome.

Effect, more rarely, also can be a verb, meaning to produce or make something happen.

The senator hoped the bill would effect a change in policy.

after, following *After* means next in time; *following* means next in order.

After the election, the Republicans took control of the House.

The following bulletin should be used as guidance for credit risk.

agree to, agree with *Agree to* means to give assent.

The bank's officers agreed to the penalty that the OCC imposed on them.

Agree with means to concur.

The Ombudsman agreed with the customer who complained about poorly managed mortgage services.

AICPA American Institute of Certified Public Accountants.

ALLL allowance for loan and lease losses.

all of In most cases, *of* is not necessary.

all the banks

all my colleagues

Of is needed before a pronoun or a possessive.

all of us

all of Europe's Central Banks

alphabetization Alphabetize lists, indexes, etc., letter by letter, rather than word by word.

No: George Mason University, George Washington University, Georgetown University

Yes: George Mason University, Georgetown University, George Washington University

AML anti-money laundering. See Bank Secrecy Act/Anti-Money Laundering.

among, between *Among* is used for more than two things or things that can be counted; *between* is used for two things.

The attorney appreciated being among her peers at the conference.

The bank examiner shuttled between Kansas City and Chicago for a year before getting a job in the Denver office.

a.m., p.m. Lowercase with periods.

analogy, analogous *Analogy* takes *with*; *analogous* takes *to*.

and/or *Or* can almost always do the job of *and/or*. If the choice must be made clear, rephrase.

No: Anyone who resists arrest shall be fined not more than \$5,000 and/or imprisoned not more than three years.

Yes: Anyone who resists arrest shall be fined not more than \$5,000 or imprisoned not more than three years, or both.

anti-money laundering See Bank Secrecy Act/Anti-Money Laundering.

anxious, eager These words are not synonymous. *Anxious* means worried or distressed. *Eager* means enthusiastic or impatient.

Federal workers were anxious to learn how the wage freeze would affect their retirement plans.

The bank was eager to convert its state charter into a national one.

apostrophe When writing and editing in Microsoft Word documents, use the “smart,” or curly, apostrophe. Avoid copying and pasting quotations from e-mails to Word documents as this imports straight or “dumb” apostrophes that must be replaced with “smart” ones.

To indicate possession, add an apostrophe and an *s* to a noun ending in *s* or an *s* sound.

Harris’s statement

Lutz’s portfolio

LBS’s conference

Joint possessors are considered a unit, so only the second element gets the apostrophe.

a father and son’s account

Separate or alternative possession requires each element to have an apostrophe.

examiner’s or auditor’s recommendation

Single lowercase letters need an apostrophe when they are plural, but capital letters do not get an apostrophe.

p’s and q’s

As and Bs

EICs

Certain expressions take apostrophes.

90 days' notice
money's worth
eight years' experience

An apostrophe indicating possession can resolve ambiguity.

Ambiguous: The dislike of bankers for the new law
led to its repeal.
Clear: Bankers' dislike for the new law led to its
repeal.

An apostrophe also can make writing more concise.

Wordy: Determine whether the definition of default
used by the model is acceptable.
Concise: Determine whether the model's definition
of default is acceptable.

See abbreviation, numbers.

appendix The plural is *appendixes*, not *appendices*. Appendixes
are numbered by letter: A, B, C, etc.

See capitalization (parts of a document).

appropriate Sometimes redundant.

Redundant: Examiners must determine whether
banks abide by appropriate laws and regulations.

Laws and regulations that are inappropriate are not germane.

APR annual percentage rate.

apropos When *apropos* takes a preposition, it is always *of*.

I recommend you read her article in *The Economist*
apropos of bank failures.

ARM adjustable rate mortgage.

as, as if, like, such as Each of these terms has a specific function.

As and *as if* precede phrases that contain verbs.

The unemployment rate soared just as the Labor
Department said it would.
I remember it as if it were yesterday.

Like precedes a noun or a pronoun and makes a comparison.

He acted like a kid in a candy shop.

Such as introduces an example or examples and may be used with or without commas, depending on whether the examples are restrictive or nonrestrictive.

Countries such as Spain and Ireland had high
unemployment rates during the economic
downturn.

Some countries, such as Spain and Ireland,
experienced high unemployment during the
economic downturn.

It is often smoother to use the *such xxx as* construction instead.

Such countries as Spain and Ireland experienced
high unemployment during the economic
downturn.

ASC Accounting Standards Codification, developed by the Financial Accounting Standards Board (FASB). ASC standards have replaced Financial Accounting Standards (FAS). They should be cited by number and title.

ASC 310, “Receivables”

ASC 450-20, “Loss Contingencies”

ASC 970, “Real Estate—General”

When citing ASC 310–40–15–14, for example, 310 is the topic, 40 is the subtopic, 15 is the section, and 14 is the paragraph.

ASCII American Standard Code for Information Interchange.

Associate Deputy Comptroller Capitalize. Use *AsDC* on second reference.

as such This transitional phrase should never leave the reader wondering, “As what?” The following example raises that question.

If the bank were to sell its investment banking business, it would be much more likely to survive. As such, it could concentrate on its profitable retail business.

For *as such* to make sense, the phrase must refer back to a specific entity.

The bank would be much more likely to survive as a less diversified institution. As such, it could concentrate on its profitable retail business.

assure, ensure, insure *Assure* means to give confidence to.

The defendant was assured of a speedy trial.

Ensure means to make certain and normally takes *that*.

The examiner ensured that the bank's capital was sufficient.

Writings about bank supervision are much more likely to use *ensure* than *assure*.

Insure often is mistakenly used in place of *ensure*. *Insure* should be used only when discussing insurance.

as with *Like* is generally preferable.

Like loss limits, tenor and gap limits should supplement other limits.

ATM automated teller machine.

attachment Attachments are numbered: 1, 2, 3, etc.

averse, aversion Both require *to*.

The bank was averse to following the trend.
Elizabeth had an aversion to olives.

B

B Do not use to stand for *billion* (58B). Spell out *billion* (58 billion).

backroom Not *back-room* or *back room*.

back-test (verb or noun)

bank ratings Use numerals.

banks rated 3

Bank Secrecy Act/Anti-Money Laundering Contrary to *The Chicago Manual of Style*'s hyphenation rules, *money* is uppercase in the formal name of the OCC division, Bank Secrecy Act/Anti-Money Laundering, and in all references to anti-money laundering in titles. The phrase is often abbreviated on second reference as BSA/AML.

based upon, basis Use *based on* instead of *based upon*. Avoid *on the basis of*. Basis is overused.

No: Profits grew 10 percent on an annual basis.

Yes: Profits grew 10 percent annually.

No: The more flexible approach is justified on a risk management basis.

Yes: The more flexible approach is justified by the methods of risk management.

basically Overused.

BB Banking Bulletin.

BC Banking Circular.

because See due to, because, since.

behalf *On behalf of shareholders* means as shareholders' representative. *In behalf of shareholders* means in shareholders' interest.

between See among, between.

BIF Bank Insurance Fund.

BIN bank identification number.

BIS bank information systems. Also, Bank for International Settlements.

board of directors Lowercase.

Board of Governors of the Federal Reserve System
See Federal Reserve System.

both Overused.

both ... and These paired conjunctions should be placed carefully in a sentence so that their accompanying phrases are parallel. *Both* is out of place in the following sentence.

Ungrammatical: The bank should analyze each contemplated securitization both for its impact on liquidity as an individual transaction and as a change in the aggregate funds position.

Placing *both* after *liquidity* helps to fix the grammar and make the sentence parallel.

Grammatical: The bank should analyze each contemplated securitization for its impact on liquidity both as an individual transaction and as a change in the aggregate funds position.

See either ... or, neither ... nor, not only ... but also.

brackets Use brackets for editorial explanations, corrections, or clarifications in quoted material; to replace confusing words or indicate missing ones; or when parentheses within parentheses are needed.

“I was concerned that these people would not have access to [the bank] any longer.”

“When I got to the office, he [John Doe] told me I had been promoted.”

(She later admitted that *Gone With the Wind* [1939] was her favorite movie.)

BSA Bank Secrecy Act.

bulleted series The bullets in a bulleted series should left align with the lead-in sentence. Format the items in the series with hanging indents. There should be a line space between the lead-in and the first bulleted item, and between the last bulleted item and the next paragraph.

Capitalize the first letter of the first word in each item in a bulleted series if the items do not complete a sentence. If items in a bulleted series amount to no more than a few words or a phrase, none of the items need to be punctuated, and no conjunction is required between the next-to-last and last items.

Six topics were subject to Dodd–Frank rulemaking:

- Regulatory capital
- Permissible proprietary trading
- Hedge fund and private equity fund investments
- Margin requirements for derivatives
- Executive compensation
- Real estate appraisals

If each of the items in a bulleted series completes a sentence begun by the series' lead-in, there is no punctuation after the lead-in, the first word of each item is not capitalized, and the series can be punctuated two different ways: (1) a period can terminate each item, or (2) each item can end in a comma, a conjunction can follow the next-to-last item, and a period can follow the last item.

The banker should give the appraiser

- the report format, instructions for completing the report, and forwarding addresses.
- requests for supplemental analyses for nonstandard properties, such as multiphased construction projects.
- guidelines for evaluating special-purpose properties, giving consideration to alternative uses.

A process map also displays

- the end user,
- all groups involved in the process,
- the sequence of steps, and
- the cycle time required for each step.

If all the items in the list are complete sentences, or if they are long and complex phrases, each item should end in a period. A complete sentence should precede the list, followed by a colon. An incomplete sentence should not introduce a series in which each item is a complete sentence

When overseeing IT systems, the board and management should ensure that the following circumstances are in place:

- The systems and technology support the bank's strategic goals and objectives.

- The information and reports provided by these systems are timely, accurate, reliable, consistent, complete, and relevant.
- Bank and customer information are adequately protected from unauthorized disclosure or alteration and are available when needed.
- Business resumption and contingency plans are adequate, and data retention requirements are met.

If an item in a bulleted series contains commas, and the writer prefers not to end each item with a period, a semicolon rather than a comma should terminate each item. The next-to-last item takes *and* or *or*.

The banker should give the appraiser

- the report format, instructions for completing the report, and forwarding addresses;
- requests for supplemental analyses for nonstandard properties, such as multiphased construction projects; and
- guidelines for evaluating special-purpose properties, giving consideration to alternative uses.

Lower-level bullet entries are punctuated the same as first-level bullets. The hierarchy of bulleted lists is as follows:

- First tier
 - Second tier
 - Third tier
 - Fourth tier

Simple series need not be bulleted. They can be run into body text, with or without numbers.

See lists.

bulletin board Lowercase in all references, including to bulletin boards on OCCnet.

bulletins Place the titles of OCC bulletins in quotation marks. The reference to the bulletin number is not italicized.

OCC Bulletin 2012-16, “Capital Planning: Guidance for Evaluating Capital Planning and Adequacy”

C

call report Lowercase. Also called Consolidated Reports of Condition and Income.

CAMELS Stands for *capital, asset quality, management, earnings, liquidity, and sensitivity to market risk*. Also known as the Uniform Financial Institutions Rating System (UFIRS). Do not use quotation marks around CAMELS numeric ratings.

Banks are designated “low-risk” if they have a CAMELS composite score of 1 or 2.

C&D cease and desist. When used as an adjective before a noun, hyphenate it.

a cease-and-desist order

C&I commercial and industrial.

capitalization Follow OCC capitalization rules when citing titles of books, journals, Web pages, and other similar material.

Original: “Credit, ATM, and Debit Cards: What to do if They’re Lost or Stolen”

OCC: “Credit, ATM, and Debit Cards: What to Do If They’re Lost or Stolen”

Capitalize the names of plans and reports, but do not capitalize the one- or two-word generic terms referring to them.

the OCC’s Strategic Plan; the strategic plan; the plan
the *2011 Annual Report*; the report

capitalization (job titles) Job titles are capitalized whether they precede a person's name, follow the name, or are used alone. They are not capitalized in generic references.

Vice President Marks; the Vice President
Deputy Comptroller Lee White; Lee White, Deputy
Comptroller for Public Affairs; the Deputy
Comptroller for Public Affairs
The average tenure of a corporate chief executive
officer is six years.

See titles (courtesy titles).

capitalization (names of organizations) Capitalize the names of government agencies, agency departments, agency divisions, committees, and programs whenever the names appear in their entirety. In general, do not capitalize the one- or two-word generic terms referring to them. Do not capitalize prepositions, articles, or conjunctions of fewer than four letters in the names, even if the organization or program does so.

the Northeastern District; the district
the Northeastern District Office; the district office
the Community Reinvestment Act; the act
the Department of State; the department
the Federal Deposit Insurance Corporation; the
agency
Acquisition Management; the division
the Audit Committee; the committee
the Wild Horse and Burro Program; the program
Make-a-Wish Foundation (it capitalizes "a")
the Actuarial Foundation (it capitalizes "the")

Lowercase part of an entity's title when it does not refer to the entity itself.

the Maryland Rental Allowance Program; a rental allowance

the Federal Low-Income Housing Tax Credit Program; low-income housing tax credits

Capitalize the name of a department of government, even if it is not the formal name.

State Department (formal name is the U.S. Department of State)

Treasury Department (formal name is the U.S. Department of the Treasury)

Do not capitalize the plurals of generic terms that complete the names of entities.

the Audit and Internal Control committees

capitalization (parts of a document) Lowercase *page*, *chapter*, *appendix*, *table*, *chart*, etc., in body text.

The new banking regulation can be found in appendix B.

For more information, see page 29.

carefully scrutinize, closely scrutinize *Carefully* and *closely* are redundant with *scrutinize*. *Scrutiny* is by definition close and careful.

CBS Committee on Bank Supervision.

CDC community development corporation.

CDFI community development financial institution.

CDRIA Community Development and Regulatory Improvement Act of 1994.

cease and desist See C&D.

CEBA Competitive Equality Banking Act of 1987.

center *Center on* rather than *center around*.

No: The examination centered around leasing finance.

Yes: The examination centered on leasing finance.

century Lowercase and spell out, as in *twenty-first century*.

See numbers.

certified public accountant Lowercase.

CFC Combined Federal Campaign.

CFP Certified Financial Planner. This term is capitalized while certified public accountant is not because Certified Financial Planner is a professional license conferred by an international board.

CFPB Consumer Financial Protection Bureau

CFR Code of Federal Regulations. The OCC does not use *Part* or the part symbol (§) in code citations.

No: 12 CFR Part 304

Yes: 12 CFR 304

The preferred OCC style is not to cite past the part number, but if the section and paragraph are necessary, this is how they would be rendered. The section is 83, and the paragraph is (a) or (c)(1).

12 CFR 41.83

12 CFR 41.83(a)

12 CFR 41.83(c)(1)

If a subpart must be cited, the word is spelled out and lowercased.

12 CFR 6, subpart A

The title of a part number should be in quotation marks. Words in the title and other items in the CFR should follow OCC capitalization rules.

12 CFR 41, “Fair Credit Reporting”

“Model Form for Recipients for Remittance

Transfers Exchanged Into Local Currency”

(CFR lowercases “into”)

CFTC Commodity Futures Trading Commission.

chair, chairman, chairwoman Use the correct term when appropriate. Janet Yellen, the current head of the Board of Governors of the Federal Reserve System, prefers *chair*.

chapter See capitalization (parts of a document).

charge back (verb); **charge-back** (noun)

The Uniform Commercial Code addresses a bank’s ability to charge back checks that are returned to it.

Some merchants have displayed a much higher incidence of unauthorized returns or charge-backs.

charge off (verb); **charge-off** (noun).

The bank charges off its bad loans.

The charge-off hurt bank profits.

chart, figure, table A chart is a figure. A figure is a visual component that accompanies the body text; it can be an illustration, an organizational chart, or a data chart (such as a pie chart, bar chart, map, or trend line). A table is an orderly arrangement of data in rows and columns.

See capitalization (parts of a document).

citations See legal citations.

city Lowercase references such as *the city of Boston*, but uppercase *New York City* since *city* is part of its name.

CLO collateralized loan obligation.

CMO collateralized mortgage obligation.

CMP civil money penalty.

COB close of business.

Co., Corp. See company names.

COFI cost-of-funds index.

COGS cost of goods sold.

colleges and universities The names of universities that are part of systems with multiple campuses need to be followed by a place name. Use *at* between the institution's name and location, rather than a comma or en dash.

University of California at Los Angeles

If a college or university has the same name as another institution, a location is needed to distinguish between them.

The Comptroller delivered the commencement
address at Wheaton College, in Illinois.

The Comptroller delivered the commencement
address at Wheaton College, in Massachusetts.

colon Capitalize the first word after a colon in body text only if it is the start of a complete sentence, is a proper noun, or follows a boldfaced lead-in. Use a colon if what follows the colon amplifies what precedes the colon. A colon is not necessary between an incomplete sentence and a series of items that complete it. Colons go outside end quotation marks.

This leads to a fundamental question about the future
of the industry: How will banks and thrifts fund
themselves in the years ahead?

In most states, there are two kinds of guardians: a
guardian of the person and a guardian of the
property or estate.

Objective: To review the quantity of risk and the
quality of risk management.

See bulleted series, comma, lists.

comma Place a comma between the next-to-last and the last element in a simple series.

directors, advisers, and risk specialists

For series that have internal punctuation and are not simple, a semicolon may be needed. See semicolon.

Punctuate a sentence that numbers items in a series just as you would one that does not.

The amendment allows bilateral netting in calculations of risk-based capital, provided that the netting agreement (1) is in writing, (2) does not have a walkaway clause, and (3) creates a single legal obligation.

A comma is not used between a name and the abbreviation of junior or senior, or between month and year, but is required between date and year if the exact date is used and following the year if the exact date is in the middle of a sentence.

Robert Robards Jr.

June 1999

June 20, 1999

The committee finally reached agreement at its June 20, 1999, meeting.

A comma separates two independent clauses that are separated by a conjunction.

The senator drafted the written testimony, and her legislative director wrote the oral statement.

When a restatement or example is inserted in the middle of a sentence, commas before and after the insertion help to preserve the sentence's grammar and readability (see parentheses and em dash).

Some securities are "on special," that is, much in demand, by investors.

committee and subcommittee Capitalize in complete names of committees and shortened second references, but lowercase in general references.

House Committee on Ways and Means; House Ways
and Means Committee; the committee
OCC's Executive Committee

Capitalize the complete names of subcommittees and cite their overseeing committees on first reference. If the committee has not been mentioned, use its full name. If the committee has been mentioned, a shortened version of its name can be used. On second reference, capitalize a shortened name of the subcommittee but lowercase a general reference.

the House Financial Services Committee's
Subcommittee on Financial Institutions and
Consumer Credit
the Financial Services Subcommittee on Financial
Institutions and Consumer Credit
the Financial Institutions Subcommittee; the
subcommittee

company names Corporate terms such as *Inc.* and *Ltd.* are not required in company names unless they are relevant to the context. If such a term is used, it is not preceded by a comma. Otherwise, full company names, including *Company*, *Corporation*, abbreviations, and ampersands, should be rendered according to the company's Web site, Hoover's, or another authoritative source.

compare to, compare with *Compare to* notes similarities between things.

The report compared the recent recession to that of
the 1980s.

Compare with notes differences between things.

In the fourth quarter, New England banks fared well compared with West Coast banks.

component Often unnecessary.

Wordy: Communication is a critical component of bank supervision.

Concise: Good communication is essential to bank supervision.

compose, comprise, include *Compose* means to make up or form the substance of something.

Congress is composed of two chambers.

Comprise means to consist of. The whole comprises the parts.

Wrong: Five hundred and thirty-five voting members comprise Congress.

Wrong: Congress is comprised of 535 voting members.

Right: Congress comprises 535 voting members.

Include should be used only when what follows it is a partial list of something, not a complete list.

Wrong: The colors of the American flag include red, white, and blue.

Right: The colors of the American flag are red, white, and blue.

Right: The colors of the American flag include white and blue.

comprise See compose, comprise, include.

Comptroller's Handbook *Comptroller's Handbook* should be italicized in body text. The names of booklets in the *Comptroller's Handbook* and the titles of the seven categories in the *Safety and Soundness* series should be in quotation marks.

The supervisory process is outlined in the "Large Bank Supervision" booklet of the *Comptroller's Handbook*.

The "Concentrations of Credit" booklet is included in the "Assets" category of the *Safety and Soundness* series.

The titles of the five series of booklets within the *Comptroller's Handbook* should be italicized.

Asset Management
Consumer Compliance
Examination Process
Safety and Soundness
Securities Compliance

conform *Conform to* means comply with.

No: The bank must conform with the regulation.

Yes: The bank must conform to the regulation.

But *in conformity with* means in compliance with.

The bank is in conformity with the regulation.

congressional Lowercase.

connote, denote *Connote* means to suggest or imply something beyond its explicit meaning; *denote* means to show or indicate the explicit meaning.

To some consumers, the word *foreclosure* connotes homelessness.

The Comptroller's pointed speech denoted his anger with the banks.

Consolidated Reports of Condition and Income Also known as call report.

contained in Just *in* is sufficient.

No: The forms are contained in the "Branches and Relocation" booklet.

Yes: The forms are in the "Branches and Relocation" booklet.

continual, continuous *Continual* means recurring at frequent intervals; *continuous* means going on without interruption.

continue Does not take a preposition.

No: The homeowner told the appraiser to continue on with the valuation.

Yes: The homeowner told the appraiser to continue the valuation.

convince, persuade *Convince* is followed by *of* or *that*; *persuade* also can be followed by *that*, but only *persuade* can be followed by an infinitive. *Convince* generally is used when referring to beliefs, and *persuade* is used in reference to taking an action.

The banks tried to convince consumers that their deposits were safe.

If banks can persuade consumers to open new accounts, the industry can get back on its feet.

COPPA Children's Online Privacy Protection Act of 1998.

copyright symbol Do not use the copyright symbol (©).

correspond to, correspond with *Correspond to* means match.

The findings corresponded to those of the examiners.

Correspond with means exchange letters.

Pen pals correspond with each other to share their lives and interests.

court cases See legal citations.

courtesy titles See titles (courtesy titles).

CPA certified public accountant.

CPI consumer price index.

CRA Community Reinvestment Act.

credit risk The risk to earnings or capital arising from an obligor's failure to meet the terms of any contract with the bank or otherwise to perform as agreed.

crises Plural of *crisis*.

CSBS Conference of State Bank Supervisors.

CTR currency transaction report.

curly apostrophe, quotes See apostrophe, quotation marks.

currently Often redundant, as in “The OCC is currently considering 35 branch applications.” The present tense of *is considering* makes *currently* unnecessary.

The word can be useful when placing one time frame in apposition to another.

When the United Nations was founded in 1945, it had 51 members; currently, it has 193.

CUSIP Committee on Uniform Security Identification Procedures.

D

dangling modifiers A modifier that expresses action at the start of a sentence usually modifies the sentence's subject. The modifier dangles when it modifies a subject that is unrelated to the action in the modifier.

Wrong: When considering the bank's lending activities, the following practices or conditions should trigger additional board scrutiny.

The practices or conditions aren't doing the considering, the board is, so *board* needs to be the subject of the sentence.

Right: When considering the bank's lending activities, the board should scrutinize the following practices or conditions.

Equally confusing is putting the modified word in the incorrect position.

Wrong: After growing accustomed to payroll cards, some issuers find that cardholders begin to make purchases at point-of-sale terminals.

It is the cardholders, not the issuers, who are growing accustomed.

Right: Once cardholders grow accustomed to their payroll cards, some begin to make purchases at point-of-sale terminals.

dash See em dash, cn dash, hyphen.

data It is plural and takes a plural verb.

database One word, not capitalized.

data center Lowercase when referring to the OCC's repository.

dataset One word.

dates Months are spelled out, and figures are used for months and years. A comma follows the date, and in a sentence, a comma follows the year as well.

August 30

December 3, 2001

On February 25, 1863, Abraham Lincoln signed the
National Currency Act into law.

DCFA discounted cash flow analysis.

decades See numbers.

decimals See numbers.

decision maker, decision making (nouns); **decision-making** (adjective)

decrease Overused. Alternatives are *decline*, *diminish*, *lessen*, *lower*, *reduce*, and *shrink*.

degrees See academic degrees.

denote See connote, denote.

Department of the Treasury The proper name is the *U.S. Department of the Treasury*. *Treasury Department* is acceptable shorthand on second reference.

departments (OCC) See OCC departments, divisions, units.

departments of government See capitalization (names of organizations).

depend *Depend on* rather than *depend upon*.

deposit taking (noun); **deposit-taking** (adjective)

determine *Determine whether* rather than *determine if*.

differ *To differ from* means to be unlike. *To differ with* means to disagree with.

The bank differs from its peers because it is not profitable.

The bank differs with its peers on rules for small-business lending.

different *Different from* rather than *different than*.

dissent *Dissent from* rather than *dissent with* or *to*.

district Lowercase. Uppercase only in a district's name.

Northeastern District
Northeastern District Office

Lowercase the plural *districts* even when it is part of the districts' names.

Northeastern and Central districts

See field office.

divergent *Divergent from* rather than *divergent with*.

divisions (OCC) See OCC departments, divisions, units.

documents See capitalization (parts of a document).

Dodd–Frank Wall Street Reform and Consumer Protection Act of 2010 The act’s name also can be written without “of 2010.” There is an en dash, not a hyphen or an em dash, between *Dodd* and *Frank*. On second reference, just *Dodd–Frank* is preferred.

doubt *Doubt that* rather than *doubt if*.

down payment Two words.

DPO direct public offering.

DRR designated reserve ratio.

DRUM district resource utilization model.

DTC Depository Trust Company.

DTCC Depository Trust & Clearing Corporation.

due to, because, since *Due to* is being used correctly if *attributable to* is a compatible substitute.

Wrong: Bankers are reevaluating their strategies due to the increasing competitiveness of the markets.

Right: The bank’s closure was due to mismanagement of funds.

Right: The bank’s closure was attributable to mismanagement of funds.

Use *because* to connect verb phrases.

Bankers are reevaluating long-held strategies because the markets have grown increasingly competitive.

Use *due to* to connect nouns.

Such reevaluations are due to the increasing competitiveness of the markets.

Due to the fact that can always be replaced by *because*.

Use *since* to express time or causation, but if the use of *since* results in ambiguity, use *because*.

Right: Dodd–Frank has been in effect since July 2011.

Right: Since he is a doctor, he is able to write prescriptions.

Wrong: We chose to vacation in France since we studied French.

Right: We chose to vacation in France because we studied French.

E

e- Use a hyphen in *e-banking*, *e-business*, *e-cash*, *e-commerce*, *e-mail*, *e-money*, *e-publishing*, and other e-words. When an e-word is the first word in a sentence, the *e* is capitalized, but it generally is preferable to write around it. In a title, the second part of the e-word is capitalized as well.

each other, one another *Each other* is used to refer to two things; *one another* refers to more than two things.

The infighting among board members was so severe
that the two factions had filed numerous lawsuits
against each other.

After the hurricane, employees took up collections
and made donations to support one another.

eager See *anxious*, *eager*.

earned income tax credit General references to this credit are lowercase, but *Earned Income Tax Credit program* is uppercase. Both are commonly referred to as *EITC* on second reference.

EBT electronic benefit transfer.

ECB European Central Bank.

ECOA Equal Credit Opportunity Act.

EDP electronic data processing.

EEO equal employment opportunity.

EFAA Expedited Funds Availability Act.

EFT electronic funds transfer.

e.g. Means for example (Latin, *exempli gratia*) and is followed by a comma when introducing an example. *For example* is preferred, but *e.g.* is acceptable. Not to be confused with *i.e.*, which means that is. The term is not italicized.

EIC examiner-in-charge. See examiner-in-charge for capitalization style.

EITF Emerging Issues Task Force (an offshoot of the Financial Accounting Standards Board).

either ... or Place these paired conjunctions carefully in a sentence to ensure that the phrases that follow each word are parallel.

Ungrammatical: Examiners must communicate significant deficiencies either by writing to board members or meeting with them.

Grammatical: Examiners must communicate significant deficiencies by either writing to board members or meeting with them.

Either ... or can be used only with two things.

Ungrammatical: The job applicant preferred to work in either the Denver, Chicago, or New York field offices.

Grammatical: The job applicant preferred to work in the Denver, Chicago, or New York field offices.

See both ... and, neither ... nor, not only ... but also.

ellipsis Ellipsis points are used to indicate a break in quoted material. There should be a space on either side of the ellipsis but no spaces between points. Even if what follows the ellipsis is not the start of the sentence, the first word would be capitalized if it is a grammatically complete sentence. If

the break is between sentences, the period following the first sentence should be retained. Similarly, if the break comes in the middle of a sentence, a period should conclude the sentence before the ellipsis.

Original: Last year, the OCC continued to promote the recovery of the federal banking system from the worst financial crisis since the Great Depression. In the course of its supervisory activities, the OCC encouraged national banks to address problem assets, strengthen capital and liquidity, make loans to creditworthy borrowers, and work constructively with borrowers facing financial difficulties.

Revised: Last year, the OCC continued to promote the recovery of the federal banking system from the worst financial crisis since the Great Depression. ... The OCC encouraged national banks to address problem assets, strengthen capital and liquidity, make loans to creditworthy borrowers, and work constructively with borrowers facing financial difficulties.

Other punctuation marks should remain in their original places. For example, if a break comes after a question mark, the question mark precedes the ellipsis. If the break precedes the question mark, a space and the question mark follow the ellipsis.

em dash Use an em dash, not a double hyphen, to introduce an aside amplification or an explanation (often an example or restatement). There are no spaces around an em dash.

The OCC and the Federal Reserve Board are conducting a coordinated examination of compensation practices at multiple financial firms—a so-called horizontal review—to assess compliance with the guidance.

The bank's Community Reinvestment Act rating was "outstanding"—a far cry from the "needs to improve" rating of five years ago.

The security must not be encumbered—that is, it cannot be subject to sale under repurchase agreement and cannot be pledged as collateral.

Sometimes, setting off restatements or examples between em dashes can result in a missing comma, making comprehension difficult. The restatement is better set off in parentheses or between commas.

Awkward: When risks are not warranted—that is, when they are not measured or are not backed by adequate capital—they should be avoided.

Smooth: When risks are not warranted (that is, when they are not analyzed or are not backed by adequate capital), they should be avoided.

Smooth: When risks are not warranted, that is, when they are not analyzed or are not backed by adequate capital, they should be avoided.

To create an em dash in Microsoft Word, hit Ctrl/Alt/minus sign (the minus sign is in the far upper right corner of the keyboard's number pad).

An em dash is longer than an en dash. See en dash, hyphen.

en dash Use in dates, numerals, abbreviations, votes, and spans of time, to indicate linking, *to*, or *including*. There are no spaces around an en dash.

April 22–23
1995–1998
pages 175–190
AFL–CIO
122–98 vote
six–eight months (or better, between six and eight months)

Use between nouns of the same order when their coupling creates an adjectival compound.

Gramm–Leach–Bliley Act
Iran–Iraq relations
dollar–yuan exchange rate

Use between a prefix and a noun made up of two or more words that are not hyphenated.

pro–credit union faction
non–Native Americans
post–Vietnam War

Such couplings are often improved by rewriting to eliminate the prefix (persons who are not Native Americans rather than non–Native Americans, for example).

To create an en dash in Microsoft Word, hit Ctrl/minus sign (the minus sign is in the far upper right corner of the keyboard's number pad).

An en dash is shorter than an em dash. See em dash, hyphen.

ensure See assure, ensure, insure.

entitled Use *titled* when referring to the name of a book, brochure, etc.

EPS earnings per share.

ERISA Employee Retirement Income Security Act.

ESOP employee stock ownership plan.

etc. Redundant when it concludes a series beginning with *for example* or *e.g.* When used properly, it is preceded by a comma.

EU European Union.

EVA economic value added.

Examination Handbook *Examination Handbook* should be italicized in body text. The names of the booklets in the *Examination Handbook* should be in quotation marks.

Examination Handbook 212

“One- to Four-Family Residential Real Estate Lending”

examiner-in-charge Capitalize when used as an individual’s title but lowercase in general references.

Examiner-in-Charge Fitzwilliam Darcy joined the OCC in 1975. When the Examiner-in-Charge retired in 2013, he had served in all four OCC districts as well as at Headquarters.

According to the white paper, examiners-in-charge reported that only 13 percent of institutions observed easing in commercial credit standards.

exceed, in excess of *Exceed* and *in excess of* take subjects that have surpassed a natural, customary, or legal boundary.

No: The number of profitable national banks exceeds 2,000.

Yes: More than 2,000 national banks are profitable.

Yes: The newspaper's profits exceeded expectations after five years of losses.

exclamation mark Reserve exclamation marks for true exclamations. An exclamation mark goes outside quotation marks, unless the mark is part of what is within quotes.

The latest capital markets conference was the best one yet.

What a capital markets conference it was!

We were so excited to see "Rent"!

We were so excited to see "Oklahoma!"

extent Overused.

Wordy: Determine the extent to which the loans pose risk to the bank.

Concise: Determine how much risk the loans pose to the bank.

F

Fannie Mae Official name of the Federal National Mortgage Association. *Fannie Mae* can be used in all references.

farther, further *Farther* pertains to distance; *further* pertains to everything else.

FAS Financial Accounting Standard. This standard has become obsolete with the adoption of the FASB Accounting Standards Codification. See ASC.

FASAB Federal Accounting Standards Advisory Board.

FASB Financial Accounting Standards Board.

FATF Financial Action Task Force (on money laundering).

FCM Futures Commission Merchant.

FCRA Fair Credit Reporting Act.

FDIC Federal Deposit Insurance Corporation.

FDICIA Federal Deposit Insurance Corporation Improvement Act of 1991.

FDPA Flood Disaster Protection Act.

federal Lowercase unless it is part of a title.

federal banking system Not *national banking system*.

Federal Register Italicized. In footnote and reference citations, “Fed. Reg.” should be used: 74 Fed. Reg. 59033.

Federal Reserve System The Federal Reserve System is the central bank of the United States, composed of the federal government agency called the Board of Governors of the Federal Reserve System and the 12 Federal Reserve Banks. In references to policy guidance, use the complete agency name, *Board of Governors of the Federal Reserve System*, as the issuer. *Federal Reserve Board* or *FRB* may be used on second reference. If the Federal Reserve Board is mentioned only a couple of times in a document and it is in the same paragraph, *the board* may be used on second reference if introducing the abbreviation seems unnecessary and using *Federal Reserve Board* is too cumbersome. *Federal Reserve* or *FRS* may be used on second reference for the Federal Reserve System. Do not use *the Fed*, which is too casual for OCC publications. Actions taken by specific Federal Reserve Banks should clearly delineate which bank is involved.

The Federal Reserve System was created in 1913. The Federal Reserve implements monetary policy through its control over the federal funds rate.

The Office of the Comptroller of the Currency (OCC) and the Board of Governors of the Federal Reserve System (Federal Reserve Board) published a final rule in the *Federal Register* today that replaces their existing risk-based and leverage capital rules.

The Federal Reserve Bank of St. Louis is sponsoring numerous financial literacy workshops in April.

federal savings association Use instead of *thrift* or *savings and loan* except when referring to events related to the Office of Thrift Supervision when it was in operation. If both national banks and federal savings associations are referred to more than once in a document, the first reference should be “national banks and federal savings associations (collectively, banks).” Just “banks” would then be used for the remainder of the document in collective references to both types of institutions.

FSA may be used on second reference.

fewer, less *Fewer* is for individual items, *less* for bulk amounts.

Banks made fewer loans and did less derivatives
business in the third quarter.

Fewer than 20 banks reopened last year, less than the
total the year before.

FFIEC Federal Financial Institutions Examination Council. Two
FFIEC publications are the *FFIEC Information Technology (IT)
Examination Handbook* and the *FFIEC Bank Secrecy Act/Anti-
Money Laundering (BSA/AML) Examination Manual*.

FHA Federal Housing Administration.

FICA Federal Insurance Contributions Act (also known as
Social Security).

FICO Credit score named for its developer, the Fair Isaac
Corporation. Also the abbreviation for the Financing
Corporation.

field office Lowercase for OCC offices.

the OCC's Atlanta field office

See district.

figure, chart, table A figure is a visual component that
accompanies the body text; it can be an illustration, an
organizational chart, or a data chart (such as a pie chart, bar
chart, or trend line). A table is an orderly arrangement of data in
rows and columns.

See capitalization (parts of a document).

FinCEN Financial Crimes Enforcement Network.

FINDRS Financial Institution Data Retrieval System. Replaced
NBSVDS.

FINRA Financial Industry Regulatory Authority. Formerly the National Association of Securities Dealers (NASD).

FIRREA Financial Institutions Reform, Recovery, and Enforcement Act of 1989.

fiscal year Use *fiscal year 2011* in body text and *FY 2011* in tables or charts.

flounder, founder *Flounder* means to struggle when moving; *founder* means to sink or give way.

When the ship sank, the sailors floundered as they attempted to swim to shore.
The sailors frantically bailed as the ship foundered.

FOIA Freedom of Information Act.

following See after, following.

follow up (verb); **follow-up** (noun or adjective)

FOMC Federal Open Market Committee.

footnotes In body text, if a footnote number falls at the end of a sentence, the superscript number follows the ending punctuation. Similarly, it follows a comma, colon, or semicolon if it falls in the middle of a sentence. If a page has more than one footnote at the bottom, a line space should separate the footnotes. Follow *The Chicago Manual of Style's* rules for how to treat various publications in footnotes.

In the footnote itself, the number is superscript, followed by a space.

The most recent date accessed should not be used in footnote citations in Community Affairs publications. The date may be used in publications for other business units.

forego, forgo *Forego* means to precede; *forgo* means to give up or do without.

foreign currency See money.

form Capitalize in the name of a form.

Form 1040A
Standard Form 52

form of, type of Use these phrases in the following ways.

A business that has less capital support, is experiencing rapid growth, or has large seasonal demands may require external financing, often in the form of ABL.

ABL is a specialized type of commercial lending in which assets are leveraged to extend credit in a safe and sound manner.

for-profit Hyphenated.

founder See flounder, founder.

FR *Federal Register*.

fractions See numbers.

FRB Federal Reserve Board. See Federal Reserve System.

Freddie Mac The commonly used name of the Federal Home Loan Mortgage Corporation. *Freddie Mac* can be used in all references.

FRS See Federal Reserve System.

FSA flexible spending account.

FTE full-time equivalent.

further See farther, further.

G

GAAP generally accepted accounting principles.

G&A general and administrative expenses.

GAO Government Accountability Office.

gender-specific language Try to avoid using either *he* or *she* alone when referring to an unspecified person. *He or she* is acceptable or, wherever possible, use plural nouns.

No: A bank director must be willing to put the interests of the bank ahead of his personal interests.

Yes: A bank director must be willing to put the interests of the bank ahead of his or her personal interests.

Yes: Bank directors must be willing to put the interests of the bank ahead of their personal interests.

Use gender-specific terms such as *chairman* and *chairwoman* when appropriate. Janet Yellen, the current head of the Board of Governors of the Federal Reserve System, prefers *chair*.

GIF Graphics Interchange Format.

Ginnie Mae Government National Mortgage Association. Also known as the GNMA. *Ginnie Mae* can be used in all references.

GLBA Gramm–Leach–Bliley Act of 1999. Also known as the Financial Services Modernization Act.

GNMA See Ginnie Mae.

GNP gross national product.

government Lowercase unless part of a proper name.
Lowercase in *U.S. government*.

Great Recession The recession that began in December 2007 and, according to the National Bureau of Economic Research, officially ended in June 2009.

gross domestic product Spell out lowercase on first reference, followed by “(GDP)” if there are subsequent references in the document.

GSA Government Securities Act or General Services Administration.

GSE government-sponsored enterprise.

H

HAMP Home Affordable Modification Program.

headline style See title case.

Headquarters Capitalize when referring to the OCC's main office in Washington, D.C.

his or her Use *his or her* rather than *his* when gender is not specified. OCC documents should be gender neutral. Do not use *his/her*. Do not use *their* with a singular antecedent.

historic tax credit General references to this credit are lowercase, but *Historic Tax Credit program* is uppercase, and both are often referred to as *HTC* on second reference.

HLT highly leveraged transaction.

HMDA Home Mortgage Disclosure Act of 1975.

HOLA Home Owners' Loan Act.

home buyer Two words.

homeowner One word.

however Unlike *but*, *however* cannot separate independent clauses when preceded by a mere comma. If *but* is replaced by *however*, a semicolon must replace the comma, but *however* is better placed in the middle of a sentence.

The bank must recognize a loss at the time of transfer, but it defers a gain until final disposition of the asset.

The bank must recognize a loss at the time of transfer; however, it defers a gain until final disposition of the asset.

The bank must recognize a loss at the time of transfer; it defers a gain, however, until final disposition of the asset.

HTML HyperText Markup Language.

HUD U.S. Department of Housing and Urban Development.

hyphen A hyphen clarifies the relationship between words that combine to modify a noun. The hyphen shows that the words do not modify the noun separately. Without hyphens, certain phrases might be misread.

open-end lease
off-balance-sheet activities
low-income housing
executive-level decisions
risk-based capital

But most adjectival phrases do not require a hyphen.

foreign exchange rate
real estate taxes
book entry system
adjustable rate loan

Use hyphens conservatively.

Awkward: community-bank risk-assessment-system procedures

Clear: the risk assessment system's procedures for community banks

Use a hyphen to join a word with a second word ending in *-ed* or *-ing* when these words combine to modify a third word.

time-consuming project
mortgage-backed bonds
self-liquidating assets
tax-deferred investment

Do not use a hyphen after words ending in *-ly* or with *very*.

recently appointed deputy comptroller
wholly owned subsidiary
very high inflation

A hyphen is required when the second word is a proper noun.

post-Vietnam
pro-American

A hyphen is not necessary when a compound adjective follows a noun and the meaning is clear, unless the compound is hyphenated in the dictionary.

The assets are self liquidating.
His attitude toward his company's stakeholders was self-serving.

A hyphen is used in a phrase that contains a comparative or a superlative.

smaller-size portfolio
longest-serving bank president

In Microsoft Word, the hyphen is located in the number row of the keyboard, just to the right of 0, on the nonshift level.

See em dash, en dash, numbers, prefixes, title case.

IBAA Independent Bankers Association of America.

IBIS Integrated Bank Information System.

ICBA Independent Community Bankers of America.

ICERC Interagency Country Exposure Review Committee.

ICQ internal control questionnaire.

IDA individual development account.

i.e. Means that is (Latin, *id est*) and is followed by a comma when introducing a paraphrase. *That is* is preferred, but *i.e.* is acceptable. Not to be confused with *e.g.*, which means for example. The term is not italicized.

if, whether These words often can be interchangeable in the middle of a sentence, but generally use *whether* when a choice is being described.

The bank's president did not know if she could abide by the new rule changes.

The bank's president did not know whether she should be happy about or resistant to the new rule changes.

IG Office of the Inspector General; also OIG.

IMF International Monetary Fund.

impact Do not use as a verb.

imply, infer *Imply* means to hint at or suggest; *infer* means to draw a conclusion.

When you implied that the deadline for the report was tight, I inferred that you would need it by the end of the week.

Inc. See company names.

include See compose, comprise, include.

in contrast *In contrast with* rather than *in contrast to*.

increase Overused. Alternatives are *broaden, expand, grow, rise, and widen*.

independent *Independent of* rather than *independent from*.

indicate, say Speakers *indicate* with physical gestures; their voices *say* or *reveal*.

The debater indicated his displeasure with his opponent by crossing his arms and shaking his head.

The Comptroller said profits of national banks had climbed for the fourth quarter in a row.

Alternatives are *state, show, and suggest*.

individual Use *individual* as a counterpoint to a group or organization rather than as a substitute for *person*.

An individual's compensation, especially if he or she is a manager, can be tied to the group's performance.

Financial information about customers should not be disclosed to unauthorized persons.

individual development account Often abbreviated as IDA on second reference.

individual retirement account Commonly abbreviated as IRA.

in excess of See exceed, in excess of.

infer See imply, infer.

initial Avoid when *first* will do.

initialism An initialism is an abbreviation that is formed from the first letters of a phrase and is not pronounced like a word. *OCC* is an initialism; *Alcoa* and *WJIO* are not.

See abbreviation, acronym.

inject *Inject into* rather than *inject with*.

NMTCs offer banks an opportunity to inject investment capital into economically distressed neighborhoods.

in order to In most cases, *just to* will suffice.

in place Often redundant, but there are legal circumstances when it is appropriate, such as when distinguishing between a bank having a compliance management system and having such a system in place.

in situations where See where.

insure See assure, ensure, insure.

interest rate risk No hyphen.

in terms of This phrase is wordy and can be avoided by making a specific connection.

Wordy: The economist analyzed interest rate risk in terms of its possible impact on profits.

Concise: The economist analyzed the effect of interest rate changes on profits.

Internet Uppercase. The Internet is a worldwide network of servers that are interconnected by a standard protocol of address. See URL.

intranet Lowercase. An *intranet* is a local network of computers. Any organization or business can sponsor its own intranet. The OCC's intranet is called OCCnet.

investigation *Investigation of* rather than *investigation into*.

IO interest-only.

IPO initial public offering.

IRA individual retirement account.

IRR internal rate of return. Also, interest rate risk.

irregardless Use *regardless*.

italics Italicize the names of books, newsletters, newspapers, magazines, journals, full-length reports, and pamphlets, and DVD and CD titles. If *The* is part of the publication's official name, it should be italicized as well. The official name can be found on the facsimile of the front page on many newspapers' Web sites or on the paper's online copyright page. Place in quotation marks any text references to the subtitles and section headings in a document as well as the titles of issuances, booklets, articles, short reports, courses, sessions at conferences, blog and Web page titles, and publications that are subparts of an italicized work, unless the subpart is a series with other parts within it. The title of a series would be in italics.

Use italics to emphasize words or phrases, or when referring to words as words.

See *Comptroller's Handbook*, quotation marks.

its, it's *Its* is possessive; *it's* means *it is*.

J

jargon Minimize the use of jargon or highly technical terms in OCC publications. Publications should be written so that the general public can understand them. If in some contexts jargon is necessary, include an explanation for those words or phrases that might be unfamiliar.

See term of art.

job titles See capitalization (job titles).

join *Join* rather than *join together*.

No: He joined together with the pro-Smith faction in voting for the change.

Yes: He joined the pro-Smith faction in voting for the change.

journals See italics.

JPEG or JPG Joint Photographic Experts Group, which defined the international standards for electronic images. Conforming images have a .jpeg or .jpg extension.

L

LAN local area network.

large cap See small cap, large cap.

Latin words They are not italicized.

LDC less-developed country.

lead-ins Lead-ins should be boldfaced and only the first word and proper nouns should be capitalized, without a bullet. Lead-ins can be followed by a period or a colon. They should be rendered consistently throughout a document.

Net interest margin (NIM). Interest income less interest expense divided by average earning assets.

Net interest margin (NIM); Interest income less interest expense divided by average earning assets.

legal citations Names of legal cases are italicized: *United States v. Correll*.

less See fewer, less.

Libor London InterBank Offered Rate.

like See as, as if, like, such as.

line sheet Two words.

lists A numbered list that is part of a sentence should be punctuated the same as if the numbers weren't there. Alternately, lowercase letters in parentheses may be used instead of numbers.

The top four best subagencies to work for are (1) the Environment and Natural Resources Division, (2) the Army Audit Agency, (3) the Office of the Inspector General, and (4) the Office of the Comptroller of the Currency.

If the phrase that precedes the list is a grammatically complete sentence on its own, it should be followed by a colon.

The survey identified four subagencies as the best places to work: (1) the Environment and Natural Resources Division, (2) the Army Audit Agency, (3) the Office of the Inspector General, and (4) the Office of the Comptroller of the Currency.

Lists in which items are not ranked can be preceded by a colon and not numbered.

Three traits are the hallmarks of a successful bank examiner: curiosity, excellent interpersonal skills, and flexibility.

Simple lists require no preceding punctuation.

The traits of a successful bank examiner are curiosity, excellent interpersonal skills, and flexibility.

A numbered list in a *Comptroller's Handbook* booklet that is set apart from a sentence should have a line space between each numbered entry.

To ensure that bank personnel are aware of the requirements of laws and regulations as well as the importance of avoiding even the appearance of impropriety regarding insider activities.

1. Determine through discussion with compliance and audit personnel their knowledge with regard to laws and regulations addressing insider activities. Review
 - scope of the compliance or audit review program.
 - compliance or audit review findings.
2. Determine whether management ensures personnel are aware of regulatory requirements regarding insider activities.

loan loss Hyphenate when using it as an adjective.

loan-to-value ratio Requires two hyphens.

log in (verb); **log-in** (adjective, noun)

log out (verb); **log-out** (adjective, noun)

longer-term Hyphenate before a noun.

low- and moderate-income housing

low-income housing tax credit In general references to such credits, this phrase is lowercase, but the program is the Low-Income Housing Tax Credit program. In both cases, the phrase is commonly abbreviated as *LHITC*.

LPO loan production office.

Ltd. See company names.

M

M Do not use to stand for *million* (72M). Spell out *million* (72 million).

magazines See italics.

mark to market (verb); **mark-to-market** (adjective)

matters requiring attention Lowercased. Often *MRA* on second reference.

may Do not use in tandem with *possible*, *the possibility of*, or *potential*. One indicator of possibility is sufficient.

No: Unusual activity may indicate possible fraud.

Yes: Unusual activity may indicate fraud.

MBA Mortgage Bankers Association.

MBIA Municipal Bond Insurance Association.

MBS mortgage-backed security.

MCBS Midsize and Community Bank Supervision.

memorandums Plural of *memorandum*.

methodology Distinguish *methodology* from *method*. *Methodology* describes a body of methods or a set of procedures rather than any single method or procedure.

OCC examiners employ three methods of sampling: judgmental, proportional, and numerical.

Sampling methodology describes the system comprising the three methods that examiners use.

midsize Not hyphenated in *midsize and community banks*, or in other uses.

MIS management information system.

MMDA money market deposit account.

MMF money market fund.

modest *Modest* means unassuming. If an increase or decrease in an economic variable is being discussed, use *slight* or *small*.

money Use figures for all references to money.

5 cents
35 cents
\$6.00
\$22.00
\$125.00
\$12.03

Foreign currencies follow the same rule, except that the names of currencies with little-recognized symbols should be spelled out.

£11
200 dinars

Amounts of non-U.S. dollar currencies should be identified, but conversions to U.S. dollars should always accompany them.

C\$145 (for Canadian dollars)
A\$12 (for Australian dollars)

money market, money market certificate No hyphens.

month and year See comma.

more than See over.

MRA See matters requiring attention.

MSA metropolitan statistical area.

MSRB Municipal Securities Rulemaking Board.

multifamily No hyphen.

multipart No hyphen.

N

NA This abbreviation can mean three things. When it follows a bank's name, NA means *National Association*. NA is not generally used after a bank's name except in formal circumstances. When referring to missing data in charts, figures, and tables, NA can mean *not available* or *not applicable*. A note should always explain which one it means.

NAFTA North American Free Trade Agreement.

name (verb) Use *named* rather than *named as*.

Charles G. Dawes was named Comptroller of the
Currency in 1898.

NASD National Association of Securities Dealers. Now known as the Financial Industry Regulatory Authority (FINRA).

national bank If both national banks and federal savings associations are referred to more than once in a document, the first reference should be "national banks and federal savings associations (collectively, banks)." Just "banks" would then be used for the remainder of the document in collective references to both types of institutions.

National Bank Examiner Uppercase when referring to someone who has passed the UCE; try to avoid using when referring to bank examiners in general.

national banking system Use *federal banking system*.

NBSVDS National Bank Surveillance Video Display System.
Replaced by FINDRS.

NCCT noncooperative countries and territories (in the fight against money laundering).

NCUA National Credit Union Administration.

necessity *The necessity of or for rather than the necessity to.*

No: She deplored the necessity to impose further penalties.

Yes: She deplored the necessity for further penalties.

Yes: She deplored the need to impose further penalties.

neither ... nor Place these paired conjunctions carefully in a sentence, as placement can change the meaning or the sentence may make no sense. What comes after each word must be parallel.

Ungrammatical: The bank has neither been able to profit from its new products and services nor its recent investments.

Grammatical: The bank has been able to profit from neither its new products and services nor its recent investments.

See both ... and, either ... or, not only ... but also.

New Markets Tax Credit Program This program is uppercase and often referred to on second reference as *the NMTC Program*. The credits themselves are abbreviated as *an NMTC* or *NMTCs* on second reference.

newspapers See italics.

news release Not *press release*.

NHS Neighborhood Housing Services.

NI net interest.

NIM net interest margin.

NOI net operating income.

non- Do not hyphenate unless *non-* precedes a capital letter or a compound term.

nonperforming assets
nonnegotiable
nonessential
non-European
non-interest-bearing account

nonbank No hyphen.

none Can be either singular or plural, depending on whether it is followed by a singular or a plural noun.

None of the act needs to be amended.
None of the investors say they will recover their
losses.

non-interest-bearing A *noninterest-bearing instrument* could be one that bears “noninterest.” A *non-interest-bearing instrument* is more clearly one that does not bear interest.

non-investment-grade Without the first hyphen, the financial instrument could be construed as a noninvestment.

nonprofit No hyphen. Do not use as a noun. Use *nonprofit group* or *nonprofit organization*.

NOPAT net operating profit after tax.

not only ... but also These paired conjunctions should precede as immediately as possible the two words or phrases that they link as complementary. If either conjunction is misplaced, the sentence is difficult to understand. A comma between the two phrases is not necessary.

Confusing: The new disclosures not only provided more detailed information than previous ones, but the market's reaction to them also indicates that some information had been unavailable.

Clear: The new disclosures provided not only more detailed information than previous ones but also, according to the market's reaction, information that would not have been available otherwise.

See both ... and, either ... or, neither ... nor.

nouns as adjectives Avoid using nouns to modify other nouns.

Awkward: The OCC allowed the bank to retain branches in the former head office county.

Smooth: The OCC allowed the bank to retain branches in the county where its former head office was located.

NOW negotiable order of withdrawal.

now, presently Redundant in such contexts as "the bank is now assessing the risks of further transactions of that kind."
Is assessing places the action solidly in the present.

NPV net present value.

NRC Neighborhood Reinvestment Corporation.

numbers Spell out whole numbers zero through nine. Exceptions include percentages, dates, addresses, page numbers, millions and billions, exact sums of money, the parts of the Code of Federal Regulations and the U.S. Code, bank ratings, and capital ratios.

four examiners
nine months
six years
three-year term
\$100,000 (not *\$100 thousand*)
5 million people
6 percent
10 percent and 16 percent
June 5
page 8
\$4.23
4 cents
part 6 (of the Code of Federal Regulations)
banks rated 3
tier 1 capital

Spell out numbers that begin sentences, but not titles.

Thirty-four national banks became state banks this
year.
“10 Warning Signs of Mortgage Modification
Scams”

Ordinal numbers generally follow the same rules as whole numbers, but ordinal days of the month are spelled out.

fourth violation
123rd year of existence
third of May (otherwise, May 3)
sixteenth of December (otherwise, December 16)

To denote decades, use the following forms.

1990s
the early nineties

Spell out centuries and Congresses.

twenty-first century
Ninety-Fifth Congress

In a series of numbers, the spelling-out rules still apply.

three examiners, four bankers, and 23 legislators
44 national banks, 27 federal savings associations,
and six credit unions

Place a zero before decimal expressions of less than one in
body text, equations, and tables.

0.4

Negative numbers are preceded by a hyphen.

-4
-5.9 percent
-27.3% (in tables)

Fractions should be spelled out in body text, unless they follow
numbers greater than nine or are appended to 1 percent or more.

three-quarters
one-half of 1 percent (or 0.5 percent)
six and two-thirds
25½
1¼ percent

Million and *billion* should be spelled out. Use a nonbreaking space between the number and the word to keep them together in case of bad breaks at the end of lines.

\$2 billion

NYSE New York Stock Exchange.



OCC The agency abbreviation is preceded by *the*.

OCC departments, divisions, units The OCC is divided into departments, divisions, and units. Offices at the Senior Deputy Comptroller level are called departments. Offices at the Deputy Comptroller level are called departments or divisions. Those at the Director level are divisions or units. Those at lower levels are units, groups, or teams.

Economics Department
Acquisition Management Division
Publishing Services Unit

An exception is Chief of Staff and Public Affairs, which gets no further designation.

OCC Web site See URL.

OFAC Office of Foreign Assets Control.

off-balance-sheet (adjective) A hyphen is needed after *balance*. Otherwise, in the phrase *off-balance sheet loan*, the sheet loan would be described as off-balance.

offices (OCC) See district.

offline Not *off-line*.

OIG Office of the Inspector General; also IG.

OMB Office of Management and Budget.

one another See each other, one another.

one- to four-family Use when referring to *one- to four-family loans* and other terms. Also, *five-family or more dwelling*, not *five-or-more-family dwelling*.

online Not *on-line*.

OPM Office of Personnel Management.

opt in (verb); **opt-in** (adjective)

opt out (verb); **opt-out** (adjective)

ordinal numbers See numbers.

OREO other real estate owned. See REO.

organization names See capitalization (names of organizations).

OTC over-the-counter.

OTS Office of Thrift Supervision.

outside When *outside* is a preposition and its meaning is physical, it does not take *of*.

The bank has offices outside the United States.

over *Over* can be used to describe relations in space, but *more than* is preferred in relation to superior numbers.

The blimp flew over the ballpark.
More than 30 national banks converted to state
charters last month.

P

page See capitalization (parts of a document).

P&L profit and loss statement.

parentheses Parentheses set off text within a sentence without interrupting the sentence's grammar.

Employee pension benefit plans (retirement plans) are the most common type of plan serviced by national banks.

Examiners can review work papers any time during the bank's supervisory cycle (that is, as part of planning activities, quarterly reviews, periodic monitoring, or targeted reviews).

When citing regulations or law in parentheses, place the parenthetical reference within the sentence unless the citation is a sentence itself.

The audit committee must not include administrators of the bank's fiduciary activities (12 CFR 9.9).

The audit committee must not include administrators of the bank's fiduciary activities. (See 12 CFR 9.9.)

When the parenthetical is part of a sentence, the period goes outside the parentheses. When the parenthetical is itself a sentence, a period ends the previous sentence and the parenthetical also ends with a period.

See telephone numbers.

part Lowercase, as in part 5 of title 12 of the Code of Federal Regulations.

participate *Participate in* rather than *participate with*. Avoid *participate to* and *participated from*.

passive voice See voice.

pay bands Use roman numerals for OCC pay bands: band IV, NB-V.

PCA prompt corrective action.

percent, percentage Spell out *percent* in body text. Repeat the word in multiple uses: 10 percent and 16 percent. Use the percent symbol in tables and charts.

A percentage is an amount expressed as a percent: For example, 54 percent is a percentage. If an interest rate increases from 5 percent to 6 percent, it has increased by 1 percentage point but by 20 percent.

See numbers.

period Periods are not used in all-uppercase abbreviations, except for *U.S.*, *U.K.*, and *U.N.*

See URL.

persuade See convince, persuade.

phone numbers See telephone numbers.

PIN personal identification number.

PITI principal, interest, taxes, and insurance.

plurals See abbreviation, apostrophe.

PMI private mortgage insurance.

PMSR purchased mortgage servicing rights.

PO principal-only.

point in time Wordy—use *time*.

polycymaking, policymaker No hyphens.

POS point of sale.

possessives See apostrophe.

possible, possibility See may.

postal abbreviations See state names.

PPI producer price index.

PPM Policies & Procedures Manual.

PPO preferred provider organization.

precommission examiner Not *pre-commission* or *precommissioned*.

predominant, predominate *Predominant* is an adjective, meaning most common or prevalent. *Predominate* is a verb, meaning to have control or influence over. The adverb is *predominantly*. Never use *predominately*.

prefixes Words formed with prefixes such as *non-*, *de-*, *re-*, *co-*, *extra-*, *over-*, *under-*, *pre-*, *semi-*, *post-*, and *un-* generally are not hyphenated. Exceptions are

- if the prefix ends with the same letter that follows it, and a misreading could occur, as in *co-op* and *anti-inflammatory*.
- before a capital letter, as in *post-Renaissance*.
- before a compound term, as in *non-self-sufficient*.
- if a double prefix would result, as in *sub-subparagraph*.

Check *Merriam Webster's College Dictionary* or *Webster's Third New International Dictionary, Unabridged* for guidance on spellings with these and other prefixes. If a word is not in the dictionary, it should be hyphenated. *The Chicago Manual of Style* has an extensive hyphenation guide for both compounds and words with prefixes.

prepositions Contrary to longtime tradition, it is fine to end a sentence with a preposition, as long as the result is smooth and natural.

prescreen Use *screen* instead. A *screen* is preparatory by definition, so the *pre* in *prescreen* is redundant.

presently See now, presently.

press release Use *news release*.

primarily Overused.

principal (noun, adjective), principle (noun) The noun *principal* means head or chief (hence, primary borrower is among its meanings), as well as face amount. The adjective *principal* means leading. The noun *principle* means truth, belief, policy, conviction, or general theory.

prior to Use *before*.

No: Prior to coming to the OCC, Gloria Martin was a vice president for Acme Bank.

Yes: Before coming to the OCC, Gloria Martin was a vice president for Acme Bank.

Prior to can be used when the precedence is legally necessary.

The application must be filed prior to the expiration of the rule.

programs Capitalize the full names of government programs but lowercase general references. Capitalize the word *program* only if it is part of the official name.

War on Poverty

New Deal

Making Home Affordable Program

Capital Assistance Program; assistance program

Troubled Assets Relief Program; relief program

Low-Income Housing Tax Credit program; tax credit program

pronouns Distinguish between *I* and *me*. Use *I* when the person speaking is the subject of the sentence; use *me* when the speaker is an object.

Wrong: The time is right for Kelly and I to take control of the process.

Wrong: The Comptroller asked Kelly and I to summarize the new legislation for the committee.

Right: Kelly and I will summarize the new legislation for the committee.

Right: The time is right for Kelly and me to take control of the process.

Right: The Comptroller asked Kelly and me to summarize the new legislation for the committee.

PSLRA Private Securities Litigation Reform Act of 1995.

publication names See italics.

punctuation See separate entries for various punctuation marks.

Q

question mark A question mark goes outside quotation marks, unless the mark is part of the quoted material.

“Did we fail to learn from our past mistakes, or did we take the wrong measures to address those mistakes?” he asked.

Who wrote the song “Over the Rainbow”?

Have you read the play “Who’s Afraid of Virginia Woolf?”

quotation marks Quotation marks go outside commas and periods, and inside semicolons, exclamation marks, and question marks, unless the exclamation or question mark is part of the quoted material. When writing and editing in Microsoft Word documents, use “smart,” or curly, quotes instead of straight ones.

The OCC warned consumers about the dangers of mortgages classified as “nontraditional.”

The trade group’s letter called on the committee to act “with alacrity”; the committee vowed to put off action until it hears from all interested groups.

Who said, “Everybody likes a kidder, but nobody lends him money”?

Abraham Lincoln said, “If I were two-faced, would I be wearing this one?”

Do not use quotation marks around words in parentheses that offer second references or explanatory phrases.

The Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, and the U.S. Securities and Exchange Commission (the agencies) published the proposed rule last week.
The council commenced a study of section 619 of Dodd–Frank (also known as the Volcker rule).

On first reference, place in quotation marks words or phrases that are used in a special sense. After the first reference, the words or phrases should appear without quotation marks.

Effective operational controls should be in place to ensure that the bank monitors compliance with plan provision regarding “market timing” activities.
... Market timing, while not illegal per se, can disrupt the management of a mutual fund’s investment portfolio.

In body text, place in quotation marks the subtitles and section headings in a document as well as the titles of issuances, bulletins, booklets, articles, short reports, courses, sessions at conferences, blog and Web page titles, and publications that are subparts of an italicized work, unless the subpart is a series with other parts within it. The title of a series would be in italics.

In titles and subtitles, use single quotation marks. In tables, use double quotation marks.

See italics.

R

RAP regulatory accounting principles.

RAS risk assessment system.

real time (noun); **real-time** (adjective)

record keeping (noun or adjective after a noun); **record-keeping** (adjective before a noun)

REFCORP Resolution Funding Corporation.

REIT real estate investment trust.

relet Means to lease again; the word has no hyphen.

REMIC real estate mortgage investment conduit.

REO real estate owned. See OREO.

report of examination Commonly abbreviated as ROE.

RESPA Real Estate Settlement Procedures Act.

RFPA Right to Financial Privacy Act.

risk assessment system Lowercase.

risk ratings Lowercase.

doubtful

loss

pass

special mention

substandard

ROA return on assets.

ROAA return on average assets.

ROCA risk management, operational controls, compliance, and asset quality (used to evaluate federal branches and agencies of foreign banks).

ROE return on equity or report of examination.

ROI return on investment.

rulemaking No hyphen.

S

SAIF Savings Association Insurance Fund.

S&L savings and loan. See federal savings association.

SAR Suspicious Activity Report. It is an acronym, pronounced *sar*, so references to such a report would be to *a SAR*.

Sarbanes–Oxley Act of 2002 The act’s name also can be rendered without “of 2002.”

savings and loan association See federal savings association.

say See indicate, say.

SBA Small Business Administration.

scrutinize See carefully scrutinize, closely scrutinize.

SEC Securities and Exchange Commission.

section Lowercase, as in section 9 of a law.

semicolon Use a semicolon to separate the independent clauses of a compound sentence.

Prudence is desirable at all times; it is especially desirable when credit quality is deteriorating.

A semicolon can separate restatements or examples that are independent clauses from a preceding independent clause.

Fully one-third of the bank's loans are classified "doubtful"; that is, they are unlikely to pay principal and interest in full.

A semicolon should not introduce restatements or examples that are not clauses. An em dash can be used instead.

No: Fully one-third of the bank's loans are classified "doubtful"; that is, unlikely to pay principal and interest in full.

Yes: Fully one-third of the bank's loans are classified "doubtful"—that is, unlikely to pay principal and interest in full.

Semicolons go outside end quotation marks.

senatorial Lowercase.

separate (verb) *Separate* or *separate from* rather than *separate out*.

series When possible, to make a sentence with a series parallel, every item in the series should be the same part of speech.

Ungrammatical: All communications with banks must be professional, objective, clear, and reflect a consistent opinion of the bank's condition.

Grammatical: All communications with banks must be professional, objective, and clear, and reflect a consistent opinion of the bank's condition.

See bulleted series, comma.

sign off (verb); **sign-off** (noun)

since See due to, because, since.

SIPC Securities Investor Protection Corporation.

SIS Supervisory Information System.

slash It can be used to indicate alternatives.

state bank/national bank parity
free-market/managed economies

A slash is used to signify a fraction or a ratio.

17 2/3

P/E ratio (a stock's price divided by the company's
earnings)

Do not use a slash as shorthand for *and* or in the term *and/or*.

midsize and community banks
(not midsize/community banks)
new products and revenue sources
(not new products/revenue sources)
customers, third parties, and public networks
(not customers/third parties/public networks)

See URL.

small cap, large cap These industry terms of art should be used as is, not spelled out as *small capitalization* and *large capitalization*.

“smart” apostrophe, quotation marks See apostrophe, quotation marks.

SMS Supervisory Monitoring System.

so-called This word does not need quotation marks, and the word or words that follow it do not need special treatment.

SOSA strength of support assessment.

spaces between sentences OCC publications should have one space between sentences, not two.

SPDA single-premium deferred annuity.

spelling Consult *Merriam-Webster's Collegiate Dictionary* for guidance on spelling. If more than one spelling is given for a word, the first one is the preferred spelling. For words not in the *Collegiate Dictionary*, consult *Webster's Third New International Dictionary, Unabridged*. *The Chicago Manual of Style* offers extensive guidance on hyphenation of words that are not in *Merriam-Webster's*.

SRC Supervisory Review Committee.

SRO self-regulatory organization (the Financial Industry Regulatory Authority [FINRA], for example).

staff Singular. *Staff members* or *employees* humanizes and is preferable.

Acceptable: The division's staff is studying the question.

Preferable: The division's staff members are studying the question.

state Lowercase, when making a reference to a state clear or when a state is being referred to in an official or judicial context.

He moved to the state of Washington. (as opposed to Washington, D.C.)

The state of Maryland brought suit against the company's president.

state names In body text after city names, in tables, and in charts, the names of U.S. states should be abbreviated according to Associated Press style. Eight states are not abbreviated: Alaska, Hawaii, Idaho, Iowa, Maine, Ohio, Texas, and Utah. In addresses, use postal abbreviations.

State	AP	Postal	State	AP	Postal
Alabama	Ala.	AL	Montana	Mont.	MT
Alaska	Alaska	AK	Nebraska	Neb.	NE
Arizona	Ariz.	AZ	Nevada	Nev.	NV
Arkansas	Ark.	AR	New Hampshire	N.H.	NH
California	Calif.	CA	New Jersey	N.J.	NJ
Colorado	Colo.	CO	New Mexico	N.M.	NM
Connecticut	Conn.	CT	New York	N.Y.	NY
Delaware	Del.	DE	North Carolina	N.C.	NC
Florida	Fla.	FL	North Dakota	N.D.	ND
Georgia	Ga.	GA	Ohio	Ohio	OH
Hawaii	Hawaii	HI	Oklahoma	Okla.	OK
Idaho	Idaho	ID	Oregon	Ore.	OR
Illinois	Ill.	IL	Pennsylvania	Pa.	PA
Indiana	Ind.	IN	Rhode Island	R.I.	RI
Iowa	Iowa	IA	South Carolina	S.C.	SC
Kansas	Kan.	KS	South Dakota	S.D.	SD
Kentucky	Ky.	KY	Tennessee	Tenn.	TN
Louisiana	La.	LA	Texas	Texas	TX
Maine	Maine	ME	Utah	Utah	UT
Maryland	Md.	MD	Vermont	Vt.	VT
Massachusetts	Mass.	MA	Virginia	Va.	VA
Michigan	Mich.	MI	Washington	Wash.	WA
Minnesota	Minn.	MN	West Virginia	W.Va.	WV
Mississippi	Miss.	MS	Wisconsin	Wis.	WI
Missouri	Mo.	MO	Wyoming	Wyo.	WY

Washington, D.C., takes periods in general references, and no periods in addresses: Washington, DC.

See [addresses](#).

stress testing Do not hyphenate before a noun.

stress testing requirements

subcommittee See committee and subcommittee.

such as See as, as if, like, such as.

suffixes See -um, -wide.

supervision by risk Lowercase.

T

table, figure, chart A table is an orderly arrangement of data in rows and columns. A figure is a visual component that accompanies the body text; it can be an illustration, an organizational chart, or a data chart (such as a pie chart, bar chart, or trend line).

In the row and column headings of tables, only the first word is capitalized, unless other words are proper nouns. If space allows, keep abbreviations to a minimum—spell out terms for easy reading. Tables and figures should conform to the OCC’s Visual Identity Standards, which are kept by the Communications Division.

See capitalization (parts of a document).

telephone numbers Use parentheses for area codes and do not use “1” before the area code. If the entire telephone number must be in parentheses, use hyphens.

(202) 649-6800

(202-649-6800)

term of art A word or phrase used in a special sense by a trade or profession. Sometimes a term of art descends into jargon that is too abstract and vague to be understood by more than a narrow slice of the population, and it should be clearly explained or, better, avoided.

that, which *That* signals a restrictive clause (one that does not require commas). In the following example, the OCC monitors trends and risks that specifically could affect asset quality.

The OCC also monitors systemic trends and emerging risks that could adversely affect asset quality.

Which signals a nonrestrictive clause (one that requires commas). Adding a comma and changing *that* to *which* in the above example changes the meaning. The sentence now says that the OCC’s monitoring could affect asset quality.

The OCC also monitors systemic trends and emerging risks, which could adversely affect asset quality.

the Do not capitalize at the start of an organization’s name, even if the organization capitalizes it, but capitalize if it is part of a publication’s official name.

See capitalization (names of organizations), italics.

this When the pronoun *this* begins a sentence by attempting to summarize some unspecified part of the preceding sentence, its meaning is sometimes ambiguous.

Just as the bank’s senior managers must hold individuals accountable for the accuracy of ratings, they must hold an individual responsible for the overall performance of the rating system. This means ensuring that the system and all its parts operate as intended.

It is unclear whether *this* refers to “holding the individual responsible” (what the managers do) or “being responsible” (what the individual does). To avoid such ambiguity, *this* should modify the noun it is referencing.

This individual must ensure that the system and all its parts operate as intended.

Beginning a sentence with *this* also can lead to wordiness.

Wordy: This is similar to how a traveler's check company holds the customer's funds in its own name.

Concise: Similarly, a traveler's check company holds the customer's funds in its own name.

thrifts See federal savings association.

tier Lowercase and use a numeral, as in *tier 1 capital*.

TILA Truth in Lending Act.

time Numerals, including zeros, are used for time.

10:00 a.m.

12:45 p.m.

time frame Two words.

TISA Truth in Savings Act.

title case Capitalize a title's and a subtitle's first and last words and all nouns, pronouns, verbs, adjectives, adverbs, and subordinating conjunctions (as, if, when, although, because). Lowercase articles (a, an, the), coordinating conjunctions (and, but, or, nor), and prepositions of fewer than four letters (at, by, for, of, on, off, to, in, up), unless they are the first words in the title.

If a word is hyphenated, always capitalize the first part. The second part also should be capitalized unless the second part is an article, conjunction, or preposition of fewer than four letters.

titles (courtesy titles) Use the courtesy title *Mr.* or *Ms.* on the second mention of a person's name, unless a woman prefers *Miss* or *Mrs.* Use these courtesy titles for all persons, including those with OCC titles (see exceptions below).

On the first mention of a person's name, use the full name, including middle name or middle initial as appropriate. Include a title if he or she has one.

First mention: Joseph Willard

Second mention: Mr. Willard

First mention: Deputy Comptroller Owen Clark;

Owen Clark, Deputy Comptroller for the
Western District

Second mention: Mr. Clark

First mention: Ombudsman Kira Winters

Second mention: Ms. Winters

First mention: Acting Comptroller of the Currency

Emily Roc

Second mention: Acting Comptroller Roc

First mention: Secretary of Labor Frances Perkins

Second mention: Secretary Perkins

Professional titles take precedence over other courtesy titles.

First mention: Dr. Clara Gold

Second mention: Dr. Gold

First mention: The Most Reverend Joseph Banks

Second mention: Archbishop Banks

titles (job titles) See capitalization (job titles).

trademarks Do not use the trademark symbol (™) with a trademarked name, even if the product or company does.

trade off (verb); **trade-off** (noun or adjective)

Treasury bills, Treasury notes, Treasury bonds

Treasury is uppercase; *bills*, *notes*, and *bonds* are lowercase.
But a bank has *treasury stock*.

Treasury Department See Department of the Treasury.

type of See form of, type of.

U

UBPR Uniform Bank Performance Report.

UCE Uniform Commission Examination.

UFIRS Uniform Financial Institutions Rating System. Also known as CAMELS.

See CAMELS.

-um Add an *s* to form the plural of words ending in *-um*, such as *addendum*, *colloquium*, *consortium*, *curriculum*, *memorandum*, *millennium*, *referendum*, and *symposium*.

addendum, addendums

under way Two words.

United States Spell out the noun in body text. Use *U.S.* as a modifier or in the proper names of government agencies.

units (OCC) See OCC departments, divisions, units.

URL Uniform Resource Locator. URLs should be all lowercase and do not have to be underlined. In documents, the prefix *http://* should be used only if the URL does not contain *www*. The prefix *https://* must always be used. Hyperlinks attached to URLs must have *http://*.

If a URL breaks at the end of a line, it should never break after a dot. It should break before the dot so it doesn't look like the end of a sentence. It can break either before or after a slash.

www.occ.gov/about/leadership/biographies/bio-john-walsh
.html
www.occ.gov/about/leadership/biographies/
bio-john-walsh.html
www.occ.gov/about/leadership/biographies
/bio-john-walsh.html

When referring to the OCC Web site in published materials, use *www.occ.gov*. All URLs on *www.occ.gov* must start with *www*.

URSIT Uniform Rating System for Information Technology.

U.S. Use *U.S.* in the proper names of government agencies.

See United States.

USC U.S. Code. The OCC does not use *Part* or the part symbol (§) in code citations.

The preferred OCC style is not to cite past the section number, but if the section and paragraph are necessary, this is how they would be rendered. The section is 301, and the paragraph is (a).

31 USC 301(a)

The title of a part number should be in quotation marks.

31 USC 301, "Department of the Treasury"

use The verb *use* is sometimes redundant—eliminate it when possible.

Redundant: An equation is used as the basis for rating the credit.

Clear: An equation is the basis for the credit's rating.

user-friendly Hyphenated.

user ID

USPAP Uniform Standards of Professional Appraisal Practice.

utilize *Use* is a better choice.

V

verbs Replace wordy verb/noun phrases with stronger verbs.

decided (rather than “made the decision”)

met (rather than “held a meeting”)

provides (rather than “makes provision for”)

limits (rather than “imposes limits on”)

very Often a gratuitous intensifier.

via Means by way of rather than by means of. It usually appears in itineraries, including metaphorical ones.

No: President Obama flew to Washington via Air Force One.

Yes: The examiners traveled to Los Angeles via Denver.

Yes: President Obama came to Washington via the Chicago statehouse.

voice The active voice—in which the subject of the sentence performs the action—is more direct and forceful than the passive voice.

Passive: All proposals are reviewed by the committee.

Active: The committee reviews all proposals.

Many sentences are longer and harder to read when they are in the passive voice.

Passive: Various accounting procedures should be addressed in the bank’s formal loan policy depending on the bank’s scope of operations.

Active: The bank’s formal loan policy should prescribe accounting procedures appropriate to the scope of the bank’s operations.

A passive infinitive can lead to essential information being omitted from a sentence.

Passive: The institution may require written confirmation of an oral stop payment order to be made within 14 days of the order.

Active: The institution may require the customer to confirm an oral stop payment order in writing within 14 days of the order.

The passive voice is appropriate when the object of an action is more important than whoever performed it.

The venerable mutual was renovated by Congress in 2009.

The rule was implemented on February 20, 1998.

W

WAC weighted average coupon.

WAM weighted average maturity.

Web words World Wide Web, the Web, webinar, Web linking, Web page, Web site.

where *Where* should refer only to a location. In other contexts, *in which* and *when* are preferable.

The banking agencies promoted community development activities in neighborhoods where foreclosure and housing abandonment were especially problematic.

The OCC seeks to assure a banking system in which national banks soundly manage their risks.

This practice led some banks to become undercapitalized when they came under financial stress.

In situations where should always be changed to *when*.

Wordy: Examiners should use statistical sampling in situations where internal controls are suspect.

Concise: Examiners should use statistical sampling when internal controls are suspect.

whether See if, whether.

which See that, which.

while Use predominantly to show concurrence. *While* should be used as an alternative for *although* sparingly and only when it is not ambiguous.

Ambiguous: While his high school math teacher told him he would never be good with numbers, John aced the CPA exam.

Clear: Although his high school math teacher said he would never be good with numbers, John aced the CPA exam.

who, whom *Who* is used for the subject of a sentence, in place of *he, she, or they*. *Whom* is used for the object, in place of *him, her, or them*.

Hugh McCulloch, who was appointed the first Comptroller of the Currency in 1863, served for two years. (He was appointed.)

Hugh McCulloch, whom President Abraham Lincoln appointed in 1863, served for two years. (President Lincoln appointed him.)

WI when-issued.

-wide If words with this suffix are not in *Merriam-Webster's Collegiate Dictionary*, they are hyphenated.

with, without The use of *with* and *without* sometimes can cause important ideas to be underemphasized, and they should be replaced with stronger connectives.

Unclear: The bank's incentive compensation programs could induce salespersons to recommend an unsuitable product with higher commissions.

Clear: The bank's incentive compensation programs could induce salespersons to recommend an unsuitable product because it pays higher commissions.

Unclear: If borrowers continually roll over notes without principal reductions, the bank may be providing capital instead of debt.

Clear: If borrowers do not reduce principal while continually rolling over notes, the bank may be providing capital instead of debt.

workforce One word.

work out (verb); **work-out** (noun and adjective)

work paper Two words.

workplace One word.

worksheet One word.

workstation One word.

write down (verb); **writedown** (noun)

write off (verb); **writeoff** (noun)

WWW World Wide Web.

See Internet, URL, Web words.

Y

years The following forms are used for years and decades.

1980s

the eighties

'98

the 1990s and 2000s

1998–1999

'98–'99

Z

zip code Contrary to past usage, *zip* is all lowercase, per *Merriam-Webster's*.