

Department of the Treasury, Departmental Offices
Supporting Statement and Request for Clearance
Troubled Asset Relief Program – Survey of All CPP Participants

1. Circumstances necessitating the collection of information

Authorized under the Emergency Economic Stabilization Act (EESA) of 2008 (Public Law 110-343), the Department of the Treasury has implemented several aspects of the Troubled Asset Relief Program. Among these components is a voluntary Capital Purchase Program (CPP) under which the Department may purchase qualifying capital in U.S. banking organizations. The Treasury has so far invested capital through this program in over 400 financial institutions.

As part of this program, Treasury would like to gauge, whether the capital injections made through the CPP are having the desired effect of ensuring liquidity within the banking system and thereby increasing lending activity. To gauge this, Treasury would like to monitor the lending activity of all CPP participants. The Treasury will be conducting evaluations using quarterly Call Report data supplied by these financial institutions to their primary regulator. However, in order to have a more frequent and timely snapshot of the current lending environment, Treasury is requesting the ability to conduct a monthly survey of all participants in the CPP in order to supplement the quarterly analysis.

2. Use of the data

The data will be used to provide more information on lending of banks that have received CPP funds and on overall lending conditions in the United States.

3. Use of information technology

Data will be requested via email and may be returned via email, phone, fax, and eventually a web-based submission system.

4. Efforts to identify duplication

The information that will be collected in the Survey of All CPP Participants will supplement data that the institutions produce quarterly in their reports filed with each appropriate federal banking agency. The data requested by Treasury will be based on data contained within those quarterly reports.

5. Impact on small entities

The information collection imposes only a small burden because the information should be readily available to the financial institutions.

6. Consequences of less frequent collection and obstacles to burden reduction

Treasury will conduct detailed analyses on lending and the effectiveness of the CPP program going forward from the quarterly Call Report data that are filed by each participant with their appropriate federal banking agency. However, as lending is important to economic activity and Call Report data are only available with a lag, the data

collected in the monthly survey will provide Treasury with a more current picture of the overall lending environment.

7. Circumstances requiring special information collection

Not applicable.

8. Solicitation of comments on information collection

Treasury officials have consulted with the federal banking agencies about the information collection, as well as from potential participants. Treasury is seeking emergency clearance, but will publish a notice for public comment in the Federal Register as soon as possible.

9. Provision of payments to respondents

Not applicable.

10. Assurance of confidentiality

Any confidential information provided voluntarily by financial institutions will be maintained as confidential consistent with applicable provisions of the Trade Secrets Act and Freedom of Information Act.

11. Justification of sensitive questions

Not applicable.

12. Estimated burden of information collection

Much of the data requested are prepared quarterly for all institutions and should be readily available. Only three data points will be collected: total dollar volume of consumer loans outstanding, total dollar volume of commercial loans outstanding, and total dollar volume of all loans outstanding. However, we believe the institutions will spend time reconciling the information. Therefore, Treasury estimates that the data request will take approximately one day (8 hours) to complete. Given that 500 institutions will be surveyed, the total estimated monthly burden for the collection is approximately 4,000 hours (8 hours x 500 institutions).

13. Estimated total annual cost burden to respondents

The Department estimates that there will be no annualized capital/start-up costs for the respondents to collect and submit this information.

14. Estimated cost to the federal government.

There will be no annualized capital/start-up costs for the government to receive this information.

15. Reasons for change in burden

This is a new collection.

16. Plans for tabulation, statistical analysis and publication

Treasury may conduct analyses with these data. Some analysis on the data may be published.

17. Reasons why displaying the OMB expiration date is inappropriate

Display of the OMB expiration date will create confusion because, under EESA, this program has a limited duration.

18. Exceptions to certification requirement of OMB Form 83-I

Regarding this request for OMB approval, there are no exceptions to the certification statement in item 19 of Form 83-I.