

**Supporting Statement for
Survey of Minority-Owned National Banks
OMB Control No. 1557-0236**

A. Justification

1. Circumstances that make the collection necessary:

In a letter to the U.S. Government Accountability Office dated September 14, 2006, Comptroller John C. Dugan reiterated the OCC's commitment to assessing its efforts to provide support and technical assistance to nationally chartered Minority-Owned National Banks (MONBs). To perform this assessment, it is necessary to obtain, from the individual MONBs, feedback on the effectiveness of the OCC's current efforts and suggestions for enhancing our supervisory efforts and assistance going forward. The OCC conducted its first MONB survey in 2007 as a pilot. The follow up survey administered in 2009 collected baseline data against which the OCC can compare data from future surveys in order to measure agency performance in the area of MONB support.

2. Use of the information:

The OCC will use the information to assess the needs of MONBs, and its current efforts to meet those needs. The OCC will also use the information to focus and enhance its supervisory, training and outreach activities with respect to MONBs.

3. Consideration of the use of improved information technology:

The OCC will administer all subsequent MONB surveys in an online format.

4. Efforts to identify duplication:

This information collection is unique and is not duplicated anywhere. MONBs have been surveyed by other regulatory agencies on various topics in the past, but this survey specifically focuses on the quality of OCC supervision and support.

5. Methods used to minimize burden if the collection has a significant impact on small businesses or other small entities:

This information collection does not have a significant impact on a substantial number of small entities.

6. Consequences to the Federal program if the collection were conducted less frequently:

This optimum frequency of this information collection has not yet been determined, but will be no more than annually. Less frequent collection would inhibit the OCC's ability to gauge its progress in addressing issues and improving its supervision and technical assistance to MONBs.

7. Special circumstances that would cause the collection to be conducted in a manner inconsistent with 5 CFR Part 1320:

Not applicable. This information collection is conducted in accordance with OMB guidelines in 5 CFR 1320.

8. Efforts to consult with persons outside the agency:

On March 17, 2010, the OCC published a notice in the *Federal Register* soliciting comments for 60 days on this proposed information collection (75 FR 12812). No comments received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality provided to respondents:

Responses to the questionnaire are voluntary. The information is used only to improve the OCC's supervision and assistance to MONBs. The OCC accepts anonymous responses.

11. Justification for questions of a sensitive nature:

Not applicable. There are no questions of a sensitive nature.

12. Burden estimate:

The OCC estimates the burden as follows:

39 banks @ 1 response per year = 39 responses
39 responses @ 2 hours per response = 78 burden hours

The OCC estimates the cost of the hour burden to respondents as follows:

Senior Bank Management:	100% @ 78 = 78 @ \$80	=	\$ 6,240
Total cost to respondents:		=	\$ 6,240

13. Estimate of annualized cost to respondents:

Not applicable.

14. Estimate of annualized cost to the Federal government:

Not applicable.

15. Changes in burden:

Former Burden:

40 Respondents; 80 Burden Hours

Current Burden:

39 Respondents; 78 Burden Hours

Difference:

-1 Respondent; -2 Burden Hours

16. Information regarding collections whose results are planned to be published for statistical use:

Not applicable.

17. Display of expiration date:

Not applicable. The OCC will display the OMB control number and expiration date on the first page of the collection.

18. Exceptions to the certification statement:

None.

B. Collections of Information Employing Statistical Methods:

Not applicable.