DEPARTMENT OF THE TREASURY INFORMATION COLLECTION REQUEST - SUPPORTING STATEMENT ASSESSMENT OF FEES ON LARGE BANK HOLDING COMPANIES AND NONBANK FINANCIAL COMPANIES TO COVER THE EXPENSES OF THE FINANCIAL RESEARCH FUND

A. JUSTIFICATION

1. Circumstances Necessitating the Data Collection

The Department of the Treasury, Departmental Offices is requesting a *new collection number for the final rule on the Assessment of Fees on Large Bank Holding C*ompanies and Nonbank Financial Companies Supervised by the Federal Reserve Board to Cover the Expenses of the Office of Financial Research. The Paperwork Reduction Act (PRA) classifies reporting, recordkeeping, or disclosure requirements of a regulation as an "information collection." Treasury issues this statement to support the request for OMB approval of an information collection with respect to the final rule on the assessment of fees on large bank holding companies and nonbank financial companies supervised by the Federal Reserve Board to cover the expenses of the Financial Research Fund.

The Department of the Treasury is issuing a proposed rule to implement Section 155 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Public Law 111-203 or "Dodd-Frank Act"), which directs the Department to establish by regulation an assessment schedule for bank holding companies with total consolidated assets of \$50 billion or greater and nonbank financial companies supervised by the Board of Governors of the Federal Reserve to collect assessments equal to the total expenses of the Office of Financial Research (OFR). Included in the OFR's expenses are expenses of the Financial Stability Oversight Council (FSOC), as provided under Section 118 of the Dodd-Frank Act, and certain expenses of the Federal Deposit Insurance Corporation (FDIC), as provided under Section 210 of the Dodd-Frank Act. The proposed rule outlines the key elements of Treasury's assessment program, which will collect semiannual assessment fees from these companies beginning on July 20, 2012.

2. Use of the Information

On a one time basis, assessed entities would be required to set up a bank account for fund transfers and provide the required information to the Treasury Department through an information collection form. The information collection form includes bank account routing information and contact information for the individuals at the company that will be responsible for setting up the account and ensuring that funds are available on the billing date.

¹ 44 U.S.C. § 3501 et seq.

3. Use of Information Technology

Information technology will only play a role in the collection process as the form will be a fillable PDFs which will need to be sent by email to the Bureau of Public Debt. No web-based system will be implemented.

4. Efforts to Identify Duplication

Substantially all of the information collected is not otherwise available.

5. Efforts to Minimize Burdens on Small Entities

This collection of information shall not impose burden on small entities as the affected population outlined in Section 155(d) of the Dodd-Frank Act defines the population of assessed companies as bank holding companies with total consolidated assets of \$50 billion or greater and nonbank financial companies supervised by the Board of Governors.

6. Consequences of Less Frequent Collection and Obstacles to Burden Reduction

Compliance with the Dodd-Frank Act requires timely registration and maintaining the accuracy of the information supplied.

7. Circumstances Requiring Special Information Collection

None.

8. Consultation Outside the Agency

Treasury will sought public comments through the publication of the Notice of Proposed Rulemaking (NPRM), January 3, 2012, 77 FR 35. No comments were received pertaining to PRA requirements in the NPRM.

9. Payments or Gifts to Respondents

None.

10. Assurances of Confidentiality

The information will be kept private to the extent permitted by law.

11. Justification for Sensitive Questions

None.

12. Estimated Burden of Information Collection

Hours: 24

Treasury estimates that there are currently 48 companies that would be affected, and that filling out the form and submitting it to the Treasury Department will take approximately a half hour. The aggregate paper work burden is estimated as 24 hours. We note that this represents a conservative estimate of administrative burden as some of these companies may have already established an account for payments or collections to the U.S. government.

Cost: \$600

Treasury estimates that there are certain direct costs associated with complying with these rules. On a one time basis, assessed entities would be required to provide a bank account for fund transfers and provide the required information to the Treasury Department through an information collection form. The information collection form includes bank account routing information and contact information for the individuals at the company that will be responsible for setting up the account and ensuring that funds are available on the billing date. We estimate that approximately 50 companies could be affected, and that the cost associated with filling out the form and submitting it to the Treasury Department is approximately \$600.² Treasury notes that this represents a conservative estimate of costs as some of these companies may have already established an account for payments or collections to the U.S. government.

13. Estimated Total Annual Cost Burden to Respondents or Recordkeepers

None.

14. Estimated Cost to the Federal Government

None.

15. Program Changes or Adjustments

None.

16. Plans for Tabulation, Statistical Analysis, and Publication

None.

17. Display of Expiration Date

Not applicable.

² The cost of this activity is calculated by multiplying the 50 known companies by the time it takes to complete the form (15 minutes) by an approximate hourly wage of \$48 (assuming an annual salary of \$100,000).

18. Exceptions to the Certification Requirement

None.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Not applicable.