

Supporting Statement A

OMB Control No. 1557-NEW *OCC Supplier Registration Form*

A. Justification

1. Circumstances that make the collection necessary

Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“Dodd-Frank”) requires the Office of the Comptroller of the Currency (“OCC”) to:

Develop and implement standards and procedures to ensure, to the maximum extent possible, the fair inclusion and utilization of minorities, women, and minority-owned, and women-owned businesses in all business and activities of the agency at all levels, including in procurement, insurance, and all types of contracts. 12 U.S.C. § 5452(c)(1).

Dodd-Frank also requires the OCC to develop standards for “coordinating technical assistance to such businesses.” 12 U.S.C. § 5452(b)(2)(B).

In order to comply with the Congressional mandates to develop standards for the fair inclusion and utilization of minority- and women-owned businesses and to provide effective technical assistance to these businesses, the OCC is developing an on-going system to collect up-to-date contact information and capabilities statements from potential suppliers. This information will allow the OCC to update and enhance its internal database of interested minority- and women-owned businesses. This information also will allow the OCC to measure the effectiveness of its technical assistance and outreach efforts and to target areas where additional outreach efforts are necessary.

Moreover, in collaboration with the U.S. Department of the Treasury and U.S. Small Business Administration (SBA), the OCC establishes annual small business contracting goals. The Federal Acquisitions Regulations (FAR) at 48 C.F.R. § 19.202-2 requires agencies to locate small business sources by making every reasonable effort, before issuing solicitations, to identify small businesses to be included on the solicitation list.

The collection will allow the OCC to enhance its internal database of interested small businesses, 8a participants, women-owned small businesses, service disabled veteran-owned small businesses and Historically Underutilized Business (HUB) Zone small businesses in order to comply with this FAR requirement and maximize opportunities for the OCC to meet and exceed its annual SBA goals. This will help ensure the maximum participation of small business concerns in the OCC’s procurement process.

2. Purpose and Use of the Information Collection

This collection requires supplier information to be submitted to the agency once through an electronic supplier registration website and updated by the business as information changes or new information develops.

The OCC will use the information to conduct outreach and provide technical assistance to minority- and women-owned businesses. The information also will be used to determine whether there are businesses with capabilities in certain socio-economic categories in order to assess whether set-asides pursuant to FAR Part 19 are appropriate.

3. Consideration of the use of improved information technology

This collection will involve the use of automated, electronic, or other technological collection techniques. The OCC plans to make the process available on its public website (www.occ.gov/omwi) to facilitate its access by the entire business community. Suppliers will have the ability to complete the form online and submit it to the OCC electronically.

This electronic format significantly reduces the burden associated with manual filing and submission of the form, which would take significantly longer to process. The electronic form also makes it easier for suppliers to update their contact information and make other changes in the information they provide initially.

4. Efforts to Identify Duplication and Use of Similar Information

Although information is available in the System for Award Management (SAM), the Federal government's registry for federal contractors, the OCC's collection of information from interested suppliers will enable the agency to target minority-owned and women-owned suppliers and gauge its outreach efforts. The collection also will allow businesses to provide specific information to the OCC on capabilities that meet the OCC's needs and purchasing areas.

5. Methods used to minimize burden if the collection has a significant impact on substantial number of small entities

The information requested by this collection is required to be supplied only once by each business. The one-page form is brief and asks for simple, readily available information. Additionally, the electronic registration format allows businesses to complete and submit online, without any printing, manual entries, or faxing.

6. Consequences of Collecting the Information Less Frequently

Without the implementation and use of the business registration, the OCC would not be able to capture the type of information technical assistance information that Congress is requiring pursuant to Dodd-Frank. There are no technical or legal obstacles to reducing burden.

7. Special Circumstances Relating to the Guidelines in 5 CFR 1320

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

On May 3, 2013, the OCC published a notice soliciting comments for 60 days (78 FR 26114). The OCC received no comments.

9. Explanation of Any Payment or Gift to Respondents

There is no payment/gift to respondents.

10. Assurance of Confidentiality Provided to Respondents

The provision of the supplier registration form on the part of interested supplier is voluntary and for generic supplier information, that does not require any assurances of confidentiality.

11. Justification for questions of a sensitive nature

There are no questions of a sensitive nature.

12. Burden estimate:

The OCC projects that approximately 1,000 suppliers each year will submit this voluntary supplier registration form. The time estimated to complete the form is approximately 10 minutes. Because the information that is requested is general and readily available to the supplier/respondent, the hour burden should be the same and consistent across the vast majority of the suppliers.

Assuming an individual's annual income of \$42,000 (approximate per capita income in the U.S) and total labor of 2,000 hours per year, the hourly rate would be \$21. A ten-minute session to complete the form constitutes 1/6 of an hour. As such, the cost per individual to complete the form would be approximately \$3.50. Assuming 1,000 suppliers complete and submit this form, the total cost would be \$3,500. This cost is a "start-up" cost, because the form will be submitted just once. There are no significant subsequent costs associated with this supplier registration form. This request for approval covers only one one-page form.

13. Estimates of Other Total Annual Costs to Respondents and/or Recordkeepers

None.

14. Annualized Cost to the Federal Government

There is no annualized cost to the Federal Government in collecting this supplier-registration form information. The Supplier-Registration Form consists of a static set of information that does not require a review process. Upon submission, the OCC plans to have the supplier information flow automatically to a supplier database. The collection of this information, using the automated online form, does not cause the agency to incur an additional expense.

15. Explain the reasons for any program changes or adjustments in burden

There are no program changes or adjustments as this is a new collection.

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

There are no plans for publication of individual supplier results. The OCC is required to provide a report to Congress regarding the total amounts paid to firms that have been identified as minority-owned and women-owned. While this report to Congress is made public, the individual supplier information provided by OCC suppliers is not published.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods

Not applicable.