

Office of the Comptroller of the Currency
Supporting Statement
Domestic Credit Card Data
OMB Control No. 1557-NEW

A. Justification.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

This collection involves the provision of monthly comprehensive credit card account-level data to the OCC. The OCC requires this comprehensive credit card data to obtain a detailed picture of the activities of national bank credit card issuers. The scope of the credit card data includes domestic general purpose, private label, and business card portfolios (excluding corporate and government). Additionally, it includes credit bureau attributes at the account-level and portfolio-level data. The collection request covers all credit card receivables managed by the largest national banks credit card issuers and their subsidiaries. The credit card account-level data requested uses common definitions and data elements for asset quality metrics (delinquencies, losses, etc.), forbearance activities, and segmentation by credit quality risk indicators (such as FICO scores). The credit card portfolio-level data request uses common definitions and data elements for portfolio performance metrics not likely to be captured at the account level. The account-level data collection frequency is monthly with credit attributes collected quarterly; the portfolio-level data collection is quarterly using month-end data for each month in the quarter. The data is subject to an information security program to ensure its privacy.

2. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made of any information received from the current collection.

This collection supports OCC's efforts to perform risk-based supervision of large banks by enhancing its benchmarking and analytic capabilities. Comprehensive credit card data allows early warning analysis and benchmarking across the largest federally regulated credit card issuers. A standard set of data elements and definitions allows for sound conclusions to be drawn regarding the credit card industry. The data is important and necessary to support supervisory activities to ensure the safety and soundness of the federal banking system.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Describe any consideration of using information technology to reduce burden.

The collection of information will be available electronically. Any improved information technology may be used to respond to the collection.

4. Describe efforts to identify duplication. Show specifically why any similar information

already available cannot be used or modified for use for the purposes described in Item 2 of this Supporting Statement.

The OCC has an information sharing agreement with the Consumer Financial Protection Bureau (CFPB) covering any sharing of information from their respective credit card collections.¹ The CFPB accesses account-level data from the 16 institutions from which the OCC collects data. In total, the collections cover approximately 87 percent of outstanding credit card balances by volume. The agreement establishes ownership of the data and how the OCC and the CFPB will coordinate on the collection of credit card data, including which data fields to collect, what validation checks should be done to verify the data, the timing of the collections, and how the agencies should communicate.

The OCC has a similar information sharing agreement with the Board of Governors of the Federal Reserve System (FRB). Under that agreement, the OCC shares account-level data from nine institutions with the FRB.²

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Not applicable.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Less frequent notice would substantially impair the effectiveness of the collection.

7. Explain any special circumstances necessitating collection inconsistent with 5 CFR 1320.5(d)(2).

None. The information collection is conducted in accordance with OMB guidelines in 5 CFR 1320.5(d)(2).

8. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format and on the data elements to be recorded, disclosed, or reported. Include citations to any relevant Federal Register notices, summarize any comments received, and indicate any actions taken in response to comments.

¹ “Memorandum of Understanding Between the Consumer Financial Protection Bureau and the Office of the Comptroller of the Currency Regarding the Collection and Sharing of Data,” April 8, 2013.

² “Memorandum of Understanding Among the Board of Governors of the Federal Reserve System and the the Office of the Comptroller of the Currency Regarding the Collection and Sharing of Supervisory Data,” March 1, 2013.

The OCC issued a notice regarding this collection for 60 days of comment on September 5, 2014, (79 FR 53101). The OCC received comments regarding the collection from two trade associations.

One trade association recommended that the OCC: (a) extend the comment period for the information collection; (b) publish a copy of the proposed information collection; and (c) provide sufficient additional detail to permit informed comment.

The other trade association acknowledged that, while the notice provided a general description of the data requested, it did not include the specific data templates. In addition, it was not clear to the commenter which national banks would be subject to the data collection, the timeframe for submission, and the effective date of the collection. The commenter also suggested that the data collection might duplicate data that banking organizations already are providing to the Federal Reserve Board (FRB) in connection with the FR Y-14 reporting requirements and pointed out that the potential for duplication is especially relevant to national banks that are the dominant subsidiary in a holding company structure. The commenter recommended coordination of the data collection with the FRB to minimize duplicative or divergent reporting requirements. The commenter suggested that the OCC consider accepting data currently submitted to the FRB in connection with the FR Y-14 in satisfaction of the data collection or work with the FRB to establish a single set of data with identical file layouts and definitions. The commenter also suggested, as an alternative, having the FRB add data elements to the FR Y-14 that designate whether a loan is part of the bank or a non-bank affiliate.

The request to extend the existing comment period, publish a copy of the proposed collection, and provide sufficient additional detail to permit informed comment will be met by issuance of the 30-day notice and the Information Collection Request (ICR) submission to OMB. For example, the ICR will include a Supporting Statement and a copy of the field definitions for account-level data. Additional details requested by the commenters will be included in the Supporting Statement. Furthermore, the OCC is actively exploring use of the FRB's FR Y-14 data, where possible, in order to decrease banks' reporting burden.

One commenter also indicated that the legal authority permitting the OCC to collect this information and the purpose of the collection were not disclosed. Federal law provides the OCC with extensive authority to require records and information from national banks, Federal savings associations, and their subsidiaries.³ The purpose of the collection is set forth in item 2 of this Supporting Statement.

The OCC understands the commenters concerns and will carefully consider all comments submitted in response to the 30-day notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

None.

³ See, e.g., 12 U.S.C. 481, 484, 1464(d)(1)(B).

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

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

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private, including the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Not applicable. No sensitive information is collected.

12. Provide estimates of the hour burden of the collection. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Estimated Number of Respondents: 17 (16 institutions; 1 credit bureau).

Estimated Annual Responses per Respondent: 12.

Estimated Burden per Response: 430 hours.

Estimated Total Annual Burden: 87,720 hours.

Cost to Respondents:

\$2,890,000.00

To estimate costs associated with the collection, we used the total contract cost for the information collection. OCC staff believes that national banks' and Federal savings associations' reporting costs are substantially lower.

13. Estimate of total annual startup and annual capital costs to respondents; and cost of operation, maintenance and purchase of services.

There are no start-up or operational costs for the collection. The maintenance and purchase of services is not required.

14. Provide estimates of annualized cost to the Federal government, including a description of the method used to estimate cost.

None.

15. Explain the reasons for any program changes or adjustments reported.

The increase in burden is due to the fact that this is a new collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

No publication for statistical use is contemplated.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Not applicable.

18. Explain each exception to the topics of the certification statement identified in the “Certification for Paperwork Reduction Act Submissions.”

Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable.