

**Office of the Comptroller of the Currency**  
**Supporting Statement**  
**Domestic Residential Home Equity Lending 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.**

Comprehensive home equity line of credit data is vital to assessing and monitoring credit quality and loss mitigation activities in the residential mortgage market and the federal banking system. This data is important and necessary to support supervisory activities to ensure the safety and soundness of the federal banking system. Where the respondent is both the servicer and originator of a home equity loan or line of credit, the Home Equity Residential Lending Data collection would include origination data and only servicing data where the respondent services for others. Detailed loan-level data would be collected monthly and portfolio-level data collected quarterly. All data collected would be based on standard data and definitions.

**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.**

The reported loan-level data items would include: loan number; property information; loan, line, and appraisal amounts; loan documentation information; loan-to-values and debt-to-income-ratios; non-personally identifiable borrower information; bankruptcy and foreclosure status; and other loan information. The reported portfolio-level data would include: total managed Home Equity portfolio (lines and loans), total securitized Home Equity portfolio, and other portfolio level information.

In order to match senior and junior lien residential mortgages on the same collateral, the OCC would collect additional information (add data elements) on the residential mortgage loans reported in Domestic First Lien Residential Mortgage and the Domestic Residential Home Equity Lending datasets. This data would include: property and mailing address, census tract, liquidation status, and original lien position. By matching the senior and junior liens by property ID, the OCC would gain better insight into the level of risk of both credit types, for example, current loans secured by junior liens behind past due loans secured by first liens. The data is subject to the data aggregator's Customer Information Security Program to ensure its confidentiality. The security program has the following objectives:

- ensure the security and confidentiality of data;
- protect against anticipated threats or hazards to the security or integrity of information; and
- protect against unauthorized access to or use of data that could result in substantial harm or inconvenience to any customer.

**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 meet the requirements of 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 Board of Governors of the Federal Reserve System (FRB) covering any sharing of information from their domestic residential home equity lending data collection. FRB accesses account-level data from 64 respondents, including nine financial institutions, for home equity lending data.

**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.**

The OCC published a notice regarding this collection on September 5, 2014, for 60 days of comment (79 FR 53102). One comment was received regarding the collection from a trade association.

The 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 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 for copies of the data templates will be met by the Information Collection Request, which will be submitted to the Office of Management and Budget and made publicly available at [www.reginfo.gov](http://www.reginfo.gov). Furthermore, the OCC understands the commenters concerns and is actively exploring use of the FRB's FR Y-14 data, where possible, in order to decrease banks' reporting burden.

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

None.

**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 or 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: 64.

Estimated Annual Responses per Respondent: 12.

Estimated Burden per Response: 430.

Estimated Total Annual Burden: 330,240 hours.

Cost to Respondents:

\$1,028,000.00

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.