Supporting Statement OMB Control Number 1557-0099 Foreign Branch Report of Condition

A. Justification.

1. Circumstances that make the collection of information necessary:

The Foreign Branch Report of Condition (FFIEC 030) is required by statute. Under 12 U.S.C. 602, every national banking association operating a foreign branch must file this report. The agencies need this information to monitor U.S. bank activity at overseas locations and funds flow worldwide. The agencies also need this information for planning foreign branch examinations.

2. Use of the information:

The Foreign Branch Report of Condition is the only report with balance sheet and contingent liability data collected by the agencies from foreign branches. The data collected are used by the agencies to monitor banking activity at overseas locations. On an aggregate basis, the agencies use the data to monitor U.S. bank activity in the Eurocurrency markets and in tracking funds flow worldwide. Data on specific branches or branches within a specific country or region are used in planning examinations.

The scope of the FFIEC 030S is comparable to a report filed with the Federal Reserve by U.S. banking organizations for their foreign subsidiaries. The items for this report are considered the minimum information needed to serve as indicators of higher business volume, risk, and complexity in small-sized foreign branches. The reported information is also used to monitor potential developments that may pose risks to the overall operations of the parent bank.

3. Consideration of the use of improved information technology:

The FFIEC 030 and 030S collection forms are designed to allow banks to automatically populate collected data items directly from their computerized general ledger system.

4. Efforts to identify duplication:

The FFIEC member agencies have reviewed the report form to minimize any potential duplication as part of their approval process. The Foreign Branch Report of Condition is the only report with balance sheet and contingent liability data from foreign branches.

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

Not applicable.

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

If this collection were conducted less frequently than the present annual collection, the agencies would have insufficient information regarding U.S. bank activity in the Eurocurrency markets and at specific foreign locations on which to base informed policy decisions, reports to Congress, and foreign branch examinations. Quarterly reporting by the largest foreign branches permits OCC to monitor foreign currency markets in a timely manner while minimizing burden on the respondents as a whole.

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

This collection is conducted in accordance with 5 CFR part 1320.

8. Efforts to consult with persons outside the agency:

On July 29, 2015, the OCC, the Board, and the FDIC published a notice soliciting comment for 60 days on the proposed extension of the FFIEC 030 and 030S (80 FR 45274). The agencies received no comments regarding the collection of information.

9. Payment or gift to respondents:

There is no payment or gift to respondents.

10. Any assurance of confidentiality:

The agencies will keep the information private to the extent permitted by law.

11. Justification for questions of a sensitive nature:

The collection does not include any questions of a sensitive nature.

12. Burden estimate:

<u>Estimated Number of Respondents:</u> 199 annual branch respondents (FFIEC 030); 57 quarterly branch respondents (FFIEC 030); 30 annual branch respondents (FFIEC 030S).

Estimated Average Time Per Response: 3.4 burden hours (FFIEC 030); 0.5 burden hours (FFIEC 030S).

199 respondents x 1 response = 199 responses x 3.4 hours = 676.6 hours

57 respondents x 4 responses = 228 responses x 3.4 hours = 775.2 hours

30 respondents x 1 response = 30 responses x 0.5 = 15 hours

Estimated Total Annual Burden: 1,467 hours.

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

| Clerical: | 30% x 1,467 hours = 440.1 hours @ \$20/hr = | \$ 8,802 |
|---------------------------|---|-----------------|
| Managerial/Technical: | 65% x 1,467 hours = 953.55 hours @ \$40/hr= | \$ 38,142 |
| Senior Mgmt/Professional: | 5% x 1,467 hours = 73.35 hours @ \$80/hr = | <u>\$ 5,868</u> |
| Total: | | \$ 52,812 |

13. Estimate of total annual costs to respondents (excluding cost of hour burden in Item #12):

No estimated costs, other than cost of burden hours reported in Item 12.

14. Estimate of annualized costs to the Federal government:

No estimated costs.

15. Change in burden:

<u>Former burden:</u> 467 respondents; 1,397 responses; 4,651 burden hours

New burden:

286 respondents; 457 responses; 1,467 burden hours

Difference:

-181 respondents; -940 responses; -3,184 burden hours

There are three reasons for the decline in respondents and responses. First, U.S. banks are operating fewer foreign branches than in the past. Second, revisions to the FFIEC 030 and 030S allow more branches to report on a consolidated basis on a single report form. Third, revisions to the scope of the FFIEC 030 and 030S allow more branches to report on an annual basis instead of a quarterly basis.

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

The OCC does not plan to publish the information.

17. Reasons for not displaying OMB approval expiration date:

The agencies plan to display the expiration date.

18. *Exceptions to the certification statement:*

No exceptions.

B. <u>Collections of Information Employing Statistical Methods.</u>

Not applicable, no statistical methods are used.