

**Supporting Statement for
Bank Appeals Follow-Up Questionnaire
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.

The OCC is committed to assessing its efforts to provide a fair and expeditious appeals process to institutions under its supervision. To perform this assessment, it is necessary to obtain feedback from the individual appellant institutions on the effectiveness of the OCC's Office of Ombudsman's (Ombudsman) efforts to provide a fair and expeditious appeals process and suggestions on ways to enhance the bank appeals program going forward.

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 Ombudsman will use the information gathered to assess adherence to OCC Bulletin 2013-15, "Bank Appeals Process," dated June 7, 2013, for each appeal submitted and to enhance its bank appeals program.

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 OCC administers all bank appeals follow-up questionnaires in an online format.

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.

This information collection is unique and is not duplicated anywhere.

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.

The frequency of this information collection is no more than once per appeal filed by each appellant institution. Less frequent collection would limit the Ombudsman's ability to gauge its progress in addressing issues and enhancing the bank appeals program.

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

Not applicable. This information collection is conducted in accordance with OMB guidelines in 5 CFR 1320(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.

On June 5, 2015, the OCC published a notice in the *Federal Register* soliciting comments for 60 days on this proposed information collection (80 FR 32204). No comments were received.

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 is kept confidential to the extent permitted by law. See 12 CFR part 4, subparts B and C.

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. There are no questions of a sensitive nature.

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.

The OCC Office of Ombudsman estimates the burden as follows:

15 banks @ 1 response per year = 15 responses

15 responses @ 0.17 hours per response = 2.55 burden hours

Cost of Hour Burden:

Chief Executive Officer: 2.55 burden hours x \$2,085 per burden hour¹ = \$5,316.75

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

Not applicable.

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

Not applicable.

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

There is no change in burden.

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

Not applicable.

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. The OCC will display the OMB control number and expiration date on the first page of the collection.

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

None.

¹ This figure is based on December 2013 Bureau of Labor Statistics wage data.

B. Collections of Information Employing Statistical Methods

Not applicable.