

**Request for Approval under the “Generic Information Collection Plan for the Collection of Qualitative Feedback on the Service Delivery of the Consumer Financial Protection Bureau” (OMB Control Number: 3170-0024)**

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**1. TITLE OF INFORMATION COLLECTION:**

Loan Activity Report (LAR) Formatting Tool Testing and telephone feedback

**PURPOSE:**

To receive feedback on an excel spreadsheet created by CFPB that formats data into a pipe delimited text file in order to create a tool that will help smaller entities comply with the enhanced reporting requirements of the HMDA rules set to take effect in 2017

**2. DESCRIPTION OF RESPONDENTS:**

Banks who currently file Home Mortgage Disclosure Act (HMDA) data and use the data entry software provided by the Federal Financial Institutions Examination Council (FFIEC).

As part of this testing, an initial screening call will be held with each targeted bank to determine if they are the intended audience of this tool (see below) . If a bank is part of the intended audience, it still has the opportunity to “opt out” of testing if it so chooses at the end of the call.

As part of the testing, CFPB will send the excel spreadsheet and instructions to the bank. The bank can either use real data, dummy data, or a combination of both to test the excel spreadsheet. No data is sent to the CFPB.

Once the bank has completed its testing, there will be a follow up call to ask structured questions and discuss the bank’s feedback regarding the excel spreadsheet.

**3. TYPE OF COLLECTION (ADMINISTRATION OF THE INSTRUMENT):**

**a. How will you collect the information? (Check all that apply)**

- |   |   |
|---|---|
| <input type="checkbox"/> Web-based or other forms of Social Media | <input checked="" type="checkbox"/> Telephone |
| <input type="checkbox"/> In-person                                | <input type="checkbox"/> Mail                 |
| <input type="checkbox"/> Small Discussion Group                   | <input type="checkbox"/> Focus Group          |
| <input type="checkbox"/> Other, Explain _____                     |   |

**b. Will interviewers or facilitators be used?**

- Yes  No  Not Applicable

**4. FOCUS GROUP OR SURVEY:**

**If you plan to conduct a focus group or survey, please provide answers to the following questions:**

**a. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?**

- Yes  No  Not Applicable

**b. If the answer is yes, please provide a description below. If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?**

The NCUA, OCC, and FDIC will provide a list of banks who are willing to volunteer in testing the excel spreadsheet. We will reach out to the banks provided and determine if they current manually enter data into the Data Entry Software (DES) provided by the FFIEC. Those banks who use the DES to manually enter data will be selected to test the excel spreadsheet.

**5. PERSONALLY IDENTIFIABLE INFORMATION:**

a. **Is personally identifiable information (PII) collected?**  Yes  No

b. **If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974?**  Yes  No  Not Applicable  
**If applicable, what is the link to the Privacy Impact Assessment (PIA)?**

c. **If Applicable, has a System or Records Notice (SORN) been published?**  
 Yes  No  Not Applicable  
 If yes, cite the SORN. Title: \_\_\_\_\_  
 \_\_\_\_\_ FR \_\_\_\_\_.

**6. INCENTIVES:**

a. **Is an incentive provided to participants?**  Yes  No

b. **If Yes, provide the amount or value of the incentive?** \$ n/A.

c. **If Yes, provide a statement justifying the use and amount of the incentive.**

**7. BURDEN ESTIMATES:**

Information Collection	Number of Respondents	Frequency (Responses per Respondent)	Number of Annual Responses	Average Response Time (hours)	Burden Hours
Initial Screening Call	50	1	50	0.25	12.5
Tool Testing	50	1	50	0.5	25
Follow up Call	50	1	50	0.25	12.5
<b>Totals</b>	<b>50</b>	<b>3</b>	<b>150</b>	<b>.33</b>	<b>50</b>

8. **FEDERAL COST:** The estimated annual cost to the Federal government is \$0

## 9. CERTIFICATIONS:

### **CERTIFICATION PURSUANT TO 5 CFR 1320.9, AND THE RELATED PROVISIONS OF 5 CFR 1320.8(b)(3) :**

By submitting this document, the Bureau certifies the following to be true:

- (a) It is necessary for the proper performance of agency functions;
- (b) It avoids unnecessary duplication;
- (c) It uses plain, coherent, and unambiguous terminology that is understandable to respondents;
- (d) Its implementation will be consistent and compatible with current reporting and recordkeeping practices;
- (e) It indicates the retention period for recordkeeping requirements;
- (f) It informs respondents of the information called for under 5 CFR 1320.8(b)(3):
  - (i) Why the information is being collected;
  - (ii) Use of information;
  - (iii) Burden estimate;
  - (iv) Nature of response (voluntary);
  - (v) Nature and extent of confidentiality; and
  - (vi) Need to display currently valid OMB control number;
- (g) It was developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected;
- (h) It uses effective and efficient statistical survey methodology; and
- (i) It makes appropriate use of information technology.

### **CERTIFICATION FOR INFORMATION COLLECTIONS SUBMITTED UNDER A GENERIC INFORMATION COLLECTION PLAN**

By submitting this document, the Bureau certifies the following to be true:

- The collection is voluntary.
- The collection is low-burden for respondents and low-cost for the Federal Government.
- The collection is non-controversial and does not raise issues of concern to other federal agencies.
- The results are not intended to be disseminated to the public.
- Information gathered will not be used for the purpose of substantially informing influential policy decisions.
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.
- The data collection is not statistically significant, the sample is not intended to be representative, and the results will not be used to make inferences beyond the survey sample.
- The results will not be used to measure regulatory compliance or for program evaluation.