



September 18, 2019

Memorandum to: William E. Bestani  
Policy Analyst  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Executive Office of the President

From: Manny Cabeza  
Regulatory Counsel  
Assessments and Legislation Group  
Legal Division  
Federal Deposit Insurance Corporation

RE: Listening Session on Supervisory Appeals and Dispute Resolution Process and Session Feedback Survey

Under FDIC “fast-track” generic clearance entitled “Occasional Qualitative Surveys” (3064-0127), the FDIC hereby submits for OMB review our plan for conducting listening sessions regarding the FDIC appeals and dispute resolution process (Process). Each of the nine sessions will consist of approximately 25 banking industry representatives that have registered to take part in the session. Each session will begin with an overview of the Process, followed by “Listening Session on Supervisory Appeals and Dispute Resolution Process open discussion topics,” and concluding with a discussion recap. In addition, participants will be given an “Appeals and Dispute Process Listening Session Evaluation.”

The purpose of the listening sessions is to gain information regarding the bankers’ views on the current appeals and dispute resolution process, as well as to identify potential areas for improvement. Participants will be asked to provide feedback on the following potential topics: opportunities for informally resolving disagreements between banks and FDIC Field and Regional management and staff; general processes and timeframes for pursuing formal reviews at the Division Director and Supervisory Appeals Review Committee (SARC) levels; material supervisory determinations (MSDs) in the FDIC Appeals Guidelines; the composition and functions of the SARC; the role of the Office of the Ombudsman in resolving formal and informal disagreements; other observations, recommendations, or concerns relative to the FDIC’s processes for resolving disagreements; and, opportunities for additional transparency on agency operations by expanding information available on the FDIC website. In addition, each participant will be provided a survey soliciting feedback on the listening sessions.

The FDIC estimates that there will be 9 sessions held during the year each attended by 25 respondents for a total of 225 respondents. The estimated annual burden is as follows:

*Number of Sessions:* 9  
*Estimated Number of respondents per session:* 25  
*Total Estimated Annual Respondents:* 225

*Estimated Time to Respond:*  
*Listening Sessions -* 2.5 hours  
*Evaluation Survey -* .25 hours  
*Total Estimated Time to Respond* 2.75 hours

*Total Estimated Annual Burden:* 618.75 hours

Total estimated annual burden for the collection of this information is 618.75 hours. If you have any questions, please let me know. Thank you for your consideration.