

Office of the Comptroller of the Currency
Supporting Statement
Disclosure Requirements
Supplementary Leverage Ratio
OMB Control No. 1557-0322

A. Justification.

1. Circumstances that make the collection necessary:

The supplementary leverage ratio regulations strengthen the definition of total leverage exposure and improve the measure of a banking organization's on- and off-balance sheet exposures. The rules are generally consistent with the Basel Committee on Banking Supervision's 2014 revisions and promote consistency in the calculation of this ratio across jurisdictions.

2. Use of the information:

All banking organizations that are subject to the agencies' advanced approaches risk-based capital rules¹ are required to disclose their supplementary leverage ratios.² Advanced approaches banking organizations must report their supplementary leverage ratios on the applicable regulatory reports. The calculation and disclosure requirements for the supplementary leverage ratio in the federal banking agencies' regulatory capital rules are generally consistent with international standards published by the Basel Committee on Banking Supervision. These disclosures enhance the transparency and consistency of reporting requirements for the supplementary leverage ratio by all internationally active organizations.

3. Consideration of the use of improved information technology:

National banks and federal savings associations may use any information technology that permits review by OCC examiners.

4. Efforts to identify duplication:

The required information is unique and is not duplicative of any other information already collected.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The rule only applies to institutions with 250 billion in assets or \$10 billion in foreign exposure (or a subsidiary thereof). That is, the rule does not apply to any small businesses or other small entities.

¹ 12 CFR 3.100(b)(1).

² 12 CFR 3.10(c), 3.172(d), and 3.173.

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

The OCC will not be able to adequately monitor capital levels and ensure safety and soundness if the collection were conducted less frequently.

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

The information collection will be conducted in a manner consistent with 5 CFR part 1320.

8. Efforts to consult with persons outside the agency:

The OCC issued a notice for 60 days of comment regarding this collection on _____, 2017. ___ comments were received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

The information will be kept private to the extent permitted by law.

11. Justification for questions of a sensitive nature:

There are no questions of a sensitive nature in the information collection.

12. Burden estimate:

Number of respondents: 15.

Estimated burden per respondent: 5 hours.

Estimated frequency of response: Quarterly.

Total estimated annual burden: 300 hours.

Cost to Respondents:

300 hours x \$107 = **\$32,100**

To estimate average hourly wages we reviewed data from May 2015 (released in March 2016) for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for depository credit intermediation (NAICS 522100). To estimate compensation costs associated

with the rule, we use \$107 per hour, which is based on the average of the 90th percentile for seven occupations adjusted for inflation (2 percent), plus an additional 30 percent to cover private sector benefits. Thirty percent represents the average private sector costs of employee benefits.

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

The agencies do not anticipate any additional initial setup burden for complying with the disclosure requirements because advanced approaches banking organizations are already subject to reporting the supplementary leverage ratio on the applicable regulatory reports.

14. Estimate of annualized costs to the federal government:

Not applicable.

15. Change in burden:

+ 1 Respondent; + 20 Hours

The increase in burden is due to the increase in the number of banks triggering the Advanced Approaches thresholds.

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

The OCC has no plans to publish the information for statistical purposes.

17. Reasons for not displaying OMB approval expiration date:

The OCC is not requesting permission to not display the OMB approval expiration date.

18. Exceptions to the certification statement in Item 19 of OMB Form 83-I:

None.

B. Collections of Information Employing Statistical Methods.

Not applicable.