

**Supporting Statement  
Bank Appeals Follow-Up Questionnaire  
OMB Control No. 1557-0332**

**A. Justification.**

**1. *Circumstances that make the collection necessary:***

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 efforts of the OCC's Office of Ombudsman (Ombudsman) to provide a fair and expeditious appeals process and suggestions on ways to enhance the bank appeals program going forward.

**2. *Use of the information:***

For each appeal submitted, the Ombudsman uses the information gathered to assess the appeal's consistency with OCC Bulletin 2013-15, "Bank Appeals Process," dated June 7, 2013, and to enhance its bank appeals program.

**3. *Consideration of the use of improved technology:***

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

**4. *Efforts to identify duplication:***

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. *Consequences to the federal program if the collection were conducted less frequently:***

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

Not applicable.

**8. Efforts to consult with persons outside the agency:**

The OCC issued a notice for 60 days of comment regarding this collection on February 26, 2018, 83 FR 8316. No comments were received.

**9. Payment or gift to respondents:**

None.

**10. Any assurance of confidentiality:**

The information collected is kept private to the extent permitted by law.

**11. Justification for questions of a sensitive nature:**

Not applicable.

**12. Burden estimate:**

15 banks @ 1 response per year = 15 responses  
15 responses @ 0.17 hours per response = 2.55 burden hours

**Cost of Hour Burden**

**2.55 Hours x 114 = \$290.70**

To estimate average hourly wages we reviewed data from May 2016 (released in March 2017) 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 \$114 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):**

Not applicable.

**14. Estimates of annualized cost to the federal government:**

Not applicable.

**15. Change in burden:**

There is no change in burden.

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

Not applicable.

**17. Reasons for not displaying OMB approval expiration date:**

Not applicable.

**18. Exceptions to the certification statement:**

None.

**B. Collections of Information Employing Statistical Methods**

Not applicable.