

**Supporting Statement**  
**Consumer Protections for Depository Institution Sales of Insurance**  
**12 CFR Part 14**  
**OMB Control No. 1557-0220**

**A. Justification.**

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

These information collections are required under section 305 of the Gramm-Leach-Bliley Act (GLB Act), 12 U.S.C. 1831x. Section 305 of the GLB Act requires the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System, and Federal Deposit Insurance Corporation (collectively, the Agencies) to prescribe joint consumer protection regulations that apply to retail sales practices, solicitations, advertising, and offers of any insurance product by a depository institution or by other persons performing these activities at an office of the institution or on behalf of the institution (other covered persons). Section 305 also requires those performing such activities to disclose certain information to consumers (e.g., that insurance products and annuities are not FDIC-insured).

This information collection requires national banks, federal savings associations, and other covered persons involved in insurance sales, as defined in 12 CFR 14.20(f), to make two separate disclosures to consumers. Under § 14.40, a national bank, federal savings association, or other covered person must prepare and provide orally and in writing certain insurance disclosures to consumers before the completion of the initial sale of an insurance product or annuity to a consumer and certain credit disclosures at the time of application for the extension of credit (if insurance products or annuities are sold, solicited, advertised, or offered in connection with an extension of credit).

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

Consumers use the disclosures to understand the risks associated with insurance products and annuities and to understand that they are not required to purchase, and may refrain from purchasing, certain insurance products or annuities in order to qualify for an extension of credit.

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

National banks, federal savings associations, and other covered persons may use any technology that is reasonable and appropriate for its circumstances so long as the method is consistent with 12 CFR part 14 and facilitates consumer receipt and response.

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

These disclosures are unique and cover the particular circumstances of the national bank, federal savings association, or other covered person. No duplication with other regulatory requirements exists.

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

There are no alternatives that would result in lowering the burden on small institutions, while still accomplishing the purpose of the rule.

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

The frequency of disclosure is required by the GLB Act. Less frequent collection would violate the statute.

**7. *Special circumstances necessitating collection inconsistent with 5 CFR part 1320:***

Not applicable.

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

On November 9, 2018, the OCC published a notice for 60 days of comment concerning the collection, 83 FR 56150. No comments were received.

**9. *Payment to respondents:***

Not applicable. There is no payment to respondents.

**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.

**12. Burden estimates:**

**12 CFR 14.40(a)**

Disclosures for Initial Purchases of Insurance Products:

527 respondents @ 1 response = 527 responses  
527 responses @ 1 burden hours = 527 burden hours

**12 CFR 14.40(b)**

Disclosures Relating to Applications for Credit in Connection with an Insurance Product:

527 respondents @ 1,110 responses = 579,700 responses  
579,700 responses @ 1 minute per disclosure = 9,662 burden hours

This estimate was increased from 2,635. As the OCC does not track the number of disclosures under part 14, the number of similar disclosures under Regulation Z (12 CFR part 1026) was used as a proxy.

**TOTAL BURDEN:** 10,189 burden hours.

The OCC estimates the cost of the hour burden to respondents as follows:

**10,189 hours x \$114 = \$ 1,161,546**

To estimate wages we reviewed May 2018 data for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for credit intermediation and related activities excluding nondepository credit intermediaries (NAICS 5220A1). To estimate compensation costs associated with the rule, we use \$114 per hour, which is based on the average of the 90th percentile for nine occupations adjusted for inflation (2.8 percent as of Q1 2019 according to the BLS), plus an additional 33.2 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2018 for NAICS 522: credit intermediation and related activities).

**13. Estimate of annualized cost to respondents (capital start-up and operation/maintenance):**

National banks, federal savings associations, and other covered persons use readily available equipment to comply with these information collections.

**14. Estimate of annualized costs to the government:**

None.

**15. Change in burden:**

Former Burden: 3,315 burden hours  
New Burden: 10,189 burden hours  
Difference: +6,874 burden hours

The change in the burden estimate is due to the recalculation of the burden estimates. As the OCC does not track the number of disclosures under part 14, the number of similar disclosures under Regulation Z (12 CFR part 1026) was used as a proxy.

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

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

**17. *Display of expiration date:***

None.

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

None.

**B. Collections of information employing statistical methods.**

Not applicable.