April 22, 2019

Memorandum to:        William E. Bestani

                                    Policy Analyst

                                    Office of Information and Regulatory Affairs

                                    Office of Management and Budget

From:                Manny Cabeza

Counsel

                                    Federal Deposit Insurance Corporation

 Legal Division

RE: Procedures for Monitoring Bank Secrecy Act Compliance; OMB Control Number 3064-0087; Expiration Date August 31, 2020.

On May 23, 2017 FDIC submitted a request to extend the expiration date of its information collection entitled “Procedures for Monitoring Bank Secrecy Act Compliance” (OMB Control Number 3064-0087). OMB approved the submission on August 30, 2017 and extended the validity of the ICR through August 31, 2020. The FDIC’s May 23, 2017 submission (ICR Reference No. 201702-3064-008) incorrectly reported the estimated dollar cost of burden hours as an external cost burden. The estimated dollar cost of burden hours should only be (and was) included in the Supporting Statement. The ROCIS User Guide specifically instructs agencies not to include this figure in the “Annual Cost Burden (Dollars)” column of the IC Burden Worksheet.

As a result of this error, the “Cost Burden” estimate for this information collection was overstated by $16,523,333. This non-substantive revision is being submitted to correct the error.