



October 14, 2020

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

From: Manny Cabeza
Regulatory Counsel
Federal Deposit Insurance Corporation
Legal Division

RE: FDIC Ready Reserve Survey

Under the generic clearance entitled, “Information Collection for Qualitative Research” (3064-0198), the FDIC hereby submits for OMB review the generic survey “Large Bank Working Groups to Increase Participation in 2022 Small Business Lending Survey.” The FDIC’s Small Business Lending Survey (SBLS) is a nationally-representative survey of U.S. banks’ small business lending activities and practices conducted by the U.S. Census Bureau. The first survey was conducted in 2016; FDIC will have a second collection in the field in 2022.

The SBLS contains a comprehensive set of both qualitative and quantitative questions. While the 2016 round of the SBLS had a high overall response rate across bank size (approximately 60 percent for each of our five different bank size groups), large banks—those with assets above \$10 billion—often did not answer quantitative questions related to their volume of small business lending. This low question response rate limited FDIC’s ability to fully assess the true amount of small business lending conducted by the entire U.S. banking industry.

FDIC wants to boost participation and quantitative item response rates by large banks in the 2022 SBLS and has requested the assistance of the American Bankers Association (ABA) to form a Working Group to solicit the feedback of staff from large ABA member banks on how to increase both survey participation, and quantitative question response rate.

The ABA has over 200 issue and peer based groups; we hope to approach 7 of these 200 groups that would contain participants relevant to our achieving our goal of increasing large bank participation, to ask them to join the Working Group:

- A mid-sized CEO group (covers banks with \$10B to \$50B in assets)
- A large bank group
- An accounting group
- A Call Report group
- A reporting groups that includes reporting/systems staff
- The economists research group, and
- The 1071 group (with interest in the Dodd Frank reporting requirements)

As of the fourth quarter of 2019, there are 132 institutions with over \$10 Billion in assets. The ABA expects a 20 percent response rate from these institutions, which would imply the participation of approximately 26 institutions.

In order to solicit their specialized knowledge, we hope to meet with participants who represent these 132 banks, separately for each of these 7 groups, up to four times. Each meeting would take approximately 1 hour.

Estimated Burden

Metric	Estimate
Institutions with \$10B+ assets in universe	132 Total institutions
Estimated 20 percent participation	26 Expected Institutions
7 issue/peer-based ABA groups approached	182 Points of engagement = 26 Expected Institutions x 7 Issue groups
4 meetings maximum	728 Points of engagement, taking into account frequency of meetings = 182 x 4 meetings
1 hour meetings	728 Hours = 728 x 1 hour meetings
Total Estimated Burden	728 hours

- Number of Respondents 182
- Frequency of Response 4
- Time Per Response 1 Hour

Total estimated annual burden for this collection of this information is 728 hours.

If you have any questions, please let me know. Thank you for your consideration