

**Supporting Statement
Financial Management Policies – Interest Rate Risk
OMB Control No. 1557-0299**

A. Justification.

1. *Circumstances that make the collection necessary:*

This information collection covers the recordkeeping burden for maintaining data in accordance with the OCC's regulation on interest rate risk procedures for Federal savings associations, 12 CFR 163.176.

2. *Use of the information:*

The purpose of the collection is to ensure that Federal savings associations appropriately manage their exposure to interest rate risk. To comply with this recordkeeping requirement, institutions need to maintain records sufficient for determining how they monitor and manage interest rate risk exposure internally.

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

The OCC encourages Federal savings associations to use any advanced technology available to them.

4. *Efforts to identify duplication:*

This information collection does not duplicate any other information collection.

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

This information collection impacts all Federal savings associations, including small Federal savings associations. Federal savings associations can minimize burden by scaling their policies and procedures to the size of the institution and level of interest rate risk present.

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

The OCC will be unable to determine whether an institution is managing its interest rate risk in a safe and sound manner absent this data.

7. *Special circumstances necessitating the collection to be conducted in a manner inconsistent with 5 CFR part 1320:*

The information collection is conducted in accordance with OMB's guidelines in 5 CFR part 1320.

8. Efforts to consult with persons outside the agency:

On December 12, 2019, the OCC issued a notice for 60 days of comment concerning this collection, 84 FR 68011. No comments were received.

9. Payment to respondents:

None.

10. Any assurance of confidentiality:

Responses will be kept confidential to the extent permitted by law.

11. Justification for questions of a sensitive nature:

Not Applicable. No personally identifiable information is collected.

12. Burden estimate:

Estimated Number of Respondents: 304.

Estimated Annual Burden per Respondent: 40 hours.

Estimated Total Burden: 12,160 hours.

Cost of Hour Burden:

12,160 x \$114 = \$1,386,240.

To estimate wages, the OCC 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, the OCC uses \$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 the total annualized cost to respondents:

Not applicable.

14. Estimate of annualized cost to the Federal government:

Not applicable.

15. Changes in burden:

Prior Burden: 372 respondents; 14,880 hours.

Current Burden: 304 respondents; 12,160 hours

Difference: -2,720 hours, due to a lower number of Federal savings associations.

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

Not applicable.

17. Display of expiration date:

Not applicable.

18. Exceptions to certification statement:

Not applicable.

B. Collections of Information Employing Statistical Methods.

Not applicable.