

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSIONS
OMB No. 1530-0001
“Minority Bank Deposit Program (MBDP) Certification Form for Admission”
FS Form 3144**

A. Justifications.

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This form is completed by financial institutions that wish to be certified as a minority institution under the Department of the Treasury, Bureau of the Fiscal Service’s Minority Bank Deposit Program. The Program implements Executive Orders 11458 (March 5, 1969), 11625 (October 13, 1971) and 12138 (May 18, 1979) and Public Law PL 101-73 which are designed to assure and increase, within the framework of efficient Federal cash management, a full and active participation of eligible minority banks, savings and loans, women’s bank and low-income credit unions, in supplying the Government’s needs for various banking relationships. Upon qualification and admission into the Program, on the basis of information provided to Treasury on the subject form, a financial institution may receive special assistance and guidance from Federal agencies and regulatory bodies, correspondent institutions, and industry associations. Notwithstanding financial institution regulators’ own programs and initiatives, to continue to participate in the program, financial institutions must submit this form and be certified on a yearly basis. Attached are copies of Executive Orders 11458, 11625 and 12138 and PL 101-73.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information provided on the Minority Bank Deposit Program Certification Form is analyzed to determine the actual percentage of minority ownership or control of the submitting financial institution. This form is used within the Bureau of the Fiscal Service, Bank Policy and Oversight Division for determining if the financial institution qualifies to participate in the Program.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Currently, the form is available from the Bureau of the Fiscal Service and also on the Internet as a fill-in PDF form with the capability for on-line submission. Minority bank participants may certify by direct mail, fax or on-line internet submission.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The Bureau of the Fiscal Service, Bank Policy and Oversight Division is the only office responsible for the Minority Bank Deposit Program and thus no duplication of this form occurs. This information collection was developed by the Bureau of the Fiscal Service for specific use in the program area. There is no similar information collection available which can be used for the purposes intended or modified for use in this program area.

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

All efforts were made to talk with the financial institutions prior to development of the subject form in order to minimize the burden on small financial institutions. The form has been under continual review over the years of use and has been revised when needed.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If the collection of information was conducted less frequently, Treasury may not be informed as to changes in ownership and control. In that case, the financial institution may remain in the Program, when in fact it may have lost its minority status.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner: *requiring respondents to report information to the agency more often than quarterly; *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; etc.**

The collection of this information is conducted in a manner which is consistent with guidelines in 5 CFR 1320.6. The collection of information cannot be conducted less frequently because the collection is initiated for a single purpose.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The Bureau's notice was published in the Federal Register on January 3, 2020, Volume 85, Page 417. No comments were received.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gifts are provided to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

In accordance with the Privacy Act of 1974, information furnished by the public will be kept confidential to the extent permitted by law.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information does not require answers that are sensitive. Information collected on this form is necessary to support certification into the Minority Bank Deposit Program. An applicable System of Records Notice for this information was published October 15, 2012. System of Records Name: Treasury/FMS.017 – Collections Records.

12. Provide estimates of the hour burden of the collection of information. The statement should: *indicate the number of respondents, frequency of response, annual hour burden; and an explanation of how the burden was estimated.

Number of respondents:	85 per year
Frequency of response:	45 mins. per report (once per year)
Annual hour burden:	64 hours

The annual hour burden to the financial institution is the estimated time to read and complete the form. The information needed on the form, numbers of shares owned by each of the groups, is information that the institutions have on hand. All of the financial institutions report to the Treasury through the Minority Bank Deposit Program Certification Form. To date, Treasury has not received any adverse comments with regard to the completion of the Minority Bank Deposit Program Certification Form or the time involved in completing this form.

This form is expected to be completed primarily by banking administrative specialists. Accounting for the value of a respondent's time, using the national average wage for business and financial operations occupations of \$37.56, the estimated labor costs for completing the form would total \$2,404¹

¹ Bureau of Labor Statistics, *May 2019 National Occupational Employment and Wage Estimates United States*, <https://www.bls.gov/oes/current/oes130000.htm>

13. Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annualized cost to the Government for this form is \$2,524.50. This estimate is based on the average time an employee takes to process the forms, the employee's salary for this time period, mailing of the form to respondents and printing of the form. The figures used were extracted from salary, work-processed and printing requisition records and experience working with the form.

Government Cost: The form will require approximately 30 minutes to review and maintain database by a Government official, at an estimated \$36 per hour labor charge. Postage and printing cost for the forms is \$76.50. Annual cost for the space required to store and maintain the completed form is minimal. There are approximately 85 financial institutions participating in the program. Annual cost is estimated at \$2,524.50 per year.

15. Explain the reasons for any program changes or adjustments.

No changes or adjustments are reported.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The information which is received is tabulated as to the number of financial institutions participating in the Program as of a certain date, and noting any increases or decreases. Also, calculations are made of the number and name of the financial institutions which are participating in the Program based on the ownership or control criteria. The time schedule varies, depending on the needs of Treasury officials.

A roster of the Minority Financial Institutions participating in the Program is published annually and posted on the Internet. In addition, this roster is mailed to financial institutions, agencies, corporations, libraries and any parties who are interested in receiving the roster.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The public interest will be better served by not printing an expiration date on the form. Printing the expiration date on the form will result in increased costs because of the need to replace inventories that become obsolete by passage of the expiration date each time OMB approval is needed. Without printing the expiration date, supplies of the form could continue to be used. Not printing the expiration date on the form will also avoid confusion among users who may have identical forms with different expiration dates in their possession.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods

The collection of this information does not employ statistical methods.