

**SUPPORTING STATEMENT  
FAST-TRACK OCCASIONAL QUALITATIVE SURVEYS  
(OMB No. 3064-0127)**

**INTRODUCTION**

The FDIC is requesting an extension without change of a fast-track generic survey information collection for occasional qualitative surveys to gather information from the public. The surveys to be deployed under this information collection involve an average of 850 respondents, generally do not require more than one hour per respondent to complete, and are always voluntary in nature. FDIC estimates that it will deploy approximately 20 such surveys in any given year. The purpose of the surveys is, in general terms, to obtain anecdotal information about quality of service, regulatory burden, problems or successes in the bank supervisory process (including both safety-and-soundness and consumer-related exams), the perceived need for regulatory or statutory change, and similar concerns. This information collection currently expires on June 30, 2020.

**A. JUSTIFICATION**

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

The FDIC, to inform policy and assess the efficiency, value and quality of services and information provided to the general public and the effectiveness, responsiveness and burden associated with the agency's interactions with the depository institutions it insures and supervises, has developed a plan to deploy occasional surveys designed to obtain anecdotal feedback or opinions from these institutions and the general public regarding these matters. While the need for these data collections can be evaluated in advance, the FDIC cannot determine the details of the specific individual collections until a later time.

2. **Use of the information:**

The surveys to be deployed pursuant to this generic clearance involve samples that are not necessarily random; the results are not necessarily representative of a larger class of potential respondents; and the goal is not to produce a statistically valid data. Rather, the surveys are expected to yield anecdotal information about the particular experiences and opinions of members of the public, primarily staff at respondent banks or bank customers, to inform the FDICs' development and improvement of the services the agency delivers and the performance of its mission. The information is used to improve the way FDIC relates to the banking industry and the public, to develop agendas for regulatory or statutory change, and in some cases to simply learn how particular policies or programs are working, or are perceived in particular cases. One use of the information is to learn ways in which burden on small banks can be reduced.

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

Appropriate technology is used to minimize burden whenever possible. The majority of the surveys are expected to be deployed in electronic form and the responses are expected to be returned in electronic form.

4. **Efforts to identify duplication:**

Each survey to be deployed under this generic clearance is unique. No duplication with other information collections exists.

5. **Methods used to minimize burden if the collection has a significant impact on a substantial number of small entities:**

The information collection does not have a significant impact on a substantial number of small entities. Care is taken to minimize the burden on small banks. One use of the information is to learn ways in which burden on small banks can be reduced.

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

The frequency of collection is held to the absolute minimum. These generic surveys are usually deployed one time. In some instances, clearance will be sought to repeat a survey each year to allow continuous monitoring of feedback on the effectiveness of FDIC programs and related interactions with the public. In the absence of these surveys the FDIC would not be able to assess the efficiency, value and effectiveness of its various programs and services and would not be able to obtain timely input from the public and the institutions it supervises.

7. **Special circumstances necessitating collection inconsistent with 5 CFR Part 1320.5(d)(2):**

None. The information is collected in a manner consistent with 5 CFR 1320.5(d)(2).

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

The FDIC published a notice in the *Federal Register* seeking comment for a 60-day period on renewal of this information collection on March 17, 2020 (85 FR 15172). No comments were received.

9. **Payment or gifts to respondents:**

None.

10. **Any assurance of confidentiality:**

Information is kept private to the extent allowed by law.

11. **Justification for questions of a sensitive nature:**

Not applicable. No sensitive information is collected.

12. **Estimate of hour burden including annualized hourly costs:**

*Estimated Annual Burden:*

In the past, FDIC estimated that it would conduct approximately 15 qualitative surveys per year under this generic clearance. FDIC estimated that, on average, each survey would have 850 respondents and each respondent would take one hour to respond for a total estimated annual burden of 12,750 hours.

Over the last three years, the FDIC conducted approximately 20 surveys per year with an estimated 13,893 respondents per year. Based on its recent experience with the use of this information collection and the anticipated number of occasional qualitative surveys expected to be deployed in the future, the FDIC has revised its estimates of the number of surveys to be deployed per year from 15 to 20. The average number of respondents per survey and the average time to respond is estimated to remain the same. The estimated annual burden for this information collection is 17,000 hours based on 20 generic surveys per year, with an average of 850 respondents each and an estimated average time to complete of 60 minutes per survey.

*Annualized Cost of Internal Hourly Burden:*

FDIC estimates that the average cost per hour for this information collection of \$105.86. FDIC allocated respondents proportionally across various representative occupational categories for each of the last 20 surveys performed under this information collection. For each survey, FDIC derived an hourly and a total cost. It added the total response times and total costs across all 20 surveys, and divided the resulting cost figure by the resulting hour figure to arrive at a composite estimated cost per hour of \$105.86. The table below shows the weighted hourly labor cost and annual burden hours for each survey and provides the information necessary to calculate the composite estimated cost per hour.

**Table 1**

Surveys Associated With OMB Control Number 3064-0127, Occasional Qualitative Surveys, as of February 26, 2020							
Survey Name	Respondents	Number of Responses per Year	Frequency of Response	Time per Response (Hours)	Annual Burden (Hours)	Hourly Weighted Labor Cost	Annual Labor Cost
Failed Bank Data Services User Survey	90	1	Once	0.083	7.50	\$57.22	\$429.15
2017 Ombudsman Customer Satisfaction Survey	480	1	Once	0.167	80.00	\$114.43	\$9,154.40
Ohio-Chartered Qualified Thrift Lender Survey	34	1	Once	0.083	2.83	\$88.00	\$249.33
Money Smart Train-the-Trainer Evaluation	840	1	Once	0.033	28.00	\$56.13	\$1,571.64
Money Smart Alliance Enrollment Survey	750	1	Once	0.083	62.50	\$66.86	\$4,178.75
FDIC 2018 Ombudsman Customer Satisfaction Survey	480	1	Once	0.167	80.00	\$114.43	\$9,154.40
2018 Money Smart for Young People Evaluation	120	1	Once	0.750	90.00	\$65.42	\$5,887.80
DRR IT Security Clause Service Provider Survey	20	1	Once	1.000	20.00	\$91.24	\$1,824.80
FDIC Franchise Marketing Survey	88	1	Once	0.333	29.33	\$84.40	\$2,475.73
FDIC.gov Public Data User Survey	500	1	Once	0.200	100.00	\$60.93	\$6,093.00
FDIC Website Feedback Survey	4,400	1	Once	0.033	146.67	\$65.94	\$9,671.20
FDIC Affordable Mortgage Lending Center Subscriber Survey	1,300	1	Once	0.083	108.33	\$60.93	\$6,600.75
FDIC 2019 Post Examination Survey - Compliance	337	1	Once	0.750	252.75	\$104.94	\$26,523.59
FDIC 2019 Post Examination Survey Joint Compliance and CRA	876	1	Once	0.750	657.00	\$104.94	\$68,945.58
FDIC 2019 Post Examination Survey - Safety and Soundness	1,492	1	Once	0.750	1,119.00	\$116.23	\$130,061.37
FDIC 2019 Post Examination Survey - Community Reinvestment Act	5	1	Once	0.800	4.00	\$99.30	\$397.20
Listening Sessions and Feedback Survey on Supervisory Appeals and Dispute Resolution Process	225	1	Once	2.750	618.75	\$135.43	\$83,797.31
FDIC 2019 Money Smart Alliance Member Survey	1,358	1	Once	0.117	158.43	\$66.86	\$10,592.85
Qualitative Survey on Usability and Design of FDIC's External Website – FDIC.gov	18	1	Once	1.000	18.00	\$56.12	\$1,010.16
2020 FDIC Office of the Ombudsman Customer Satisfaction Survey	480	1	Once	0.167	80.00	\$114.43	\$9,154.40
All Occasional Qualitative Surveys Administered Under OMB Control Number 3064-0127 as of Feb. 26, 2020		Total Number of Respondents:	13,893	Total Annual Burden Hours:	3,663.10	Total Annual Cost:	\$387,773.41
		Composite Time per Response (hours):	0.26				
		Composite Labor Cost per Hour:	\$105.86				
Notes: The Composite Time per Response (0.26 hours) multiplied by the Total Number of Respondents (13,893) will not equal the Total Annual Burden Hours (3,663.10) because Composite Time per Response has been rounded to the hundredths place. Similarly, the Composite Labor Cost per Hour (\$105.86) multiplied by the Total Annual Burden Hours (3,663.10) will not equal the Total Annual Cost (\$387,773.41) because the Composite Labor Cost per Hour has been rounded to the nearest penny. The Total Annual Burden Hours for this collection is derived by summing the unrounded results of the following calculation for each survey: Number of Respondents * Number of Responses per Year * Time per Response (Hours), which results in exactly 3,663.10 hours. Similarly, the Total Annual Cost for this collection is derived by summing the unrounded Annual Burden Hours * the Hourly Weighted Labor Cost for each survey, where the Hourly Weighted Labor Cost and the Annual Labor Cost for each survey are rounded to the nearest penny, which results in exactly \$387,773.41.							

As of February 26, 2020, this information collection covers 20 occasional qualitative surveys. Estimates of the number of respondents and time per response for each survey was aggregated to determine the total estimated number of respondents, and to calculate a composite estimated time per response for this information collection. FDIC allocated respondents across seven occupational categories. Six of these categories belong to the Depository Credit Intermediation sector: Executives & Managers; Lawyers; Compliance Officers; IT Specialists; Financial Analysts; and Clerical personnel. The seventh

category, representing respondents who are members of the general public, is the Cross-industry/All Occupations category. Hourly compensation was determined separately for each survey based on the occupations of the respondents, and was adjusted for inflation and non-monetary benefits as described below. Compensation costs for each survey were added together and divided by the total burden hours summed across the surveys to calculate a composite hourly compensation figure of \$105.86.

The Change in Hourly Burden and Change in Internal Cost figures were calculated based on the estimated burden hours reported in the 2017 Supporting Statement of 12,750 hours at an hourly wage of \$105.86, subtracted from the Total Internal Cost of \$387,773.41. The hourly wage was derived from data provided by the Bureau of Labor Statistics: "National Industry-Specific Occupational Employment and Wage Estimates: Depository Credit Intermediation Sector" and "Cross-industry, private, federal, state, and local" (May 2018), Employer Cost of Employee Compensation (December 2019), Consumer Price Index (December 2019). The 75th percentile wage information reported by the BLS in the Specific Occupational Employment and Wage Estimates does not include health benefits and other non-monetary benefits. According to the December 2019 Employer Cost of Employee Compensation data compensation rates for health and other benefits are 33.8 percent of total compensation. Additionally, the wage has been adjusted for inflation according BLS data on the Consumer Price Index for Urban Consumers (CPI-U) so that it is contemporaneous with the non-wage compensation statistic. The inflation rate was 3.11 percent between May 2018 and December 2019. Finally, the following inflation and benefit-adjusted hourly compensation amounts for each of the occupations within the Depository Credit Intermediation sector—with the exception of the "general public" occupation, which combines all industries—and their SOC codes, used in compiling a composite wage.

#### *Total Estimated Annual Cost Burden*

FDIC estimates the total annual cost burden for this information collection by multiplying the total estimated annual burden of 17,000 hours, by the weighted average hourly compensation estimate of \$105.86 to arrive at an estimated labor cost of \$1,799,620 per year.

**13. Estimate of start-up costs to respondents:**

None.

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

None.

15. **Analysis of change in burden:**

There is no change in the substance or methodology of this information collection. The change in burden is due solely to an increase in the estimated number of surveys to be deployed annually under this information collection. The increase in frequency from 15 to 20 surveys per year, resulted in an increase of 4,250 hours in total estimated annual burden from 12,750 hours to 17,000 hours.

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

The information collection results are not intended to be published.

17. **Display of expiration date:**

Each survey instrument will display the OMB Control Number and its expiration date.

18. **Exceptions to certification:**

None.

B. **COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS**

Not applicable.