

**Supporting Statement
Examination Survey
OMB Control No. 1557-0199**

A. Justification.

1. Circumstances that make the collection necessary:

This information collection provides the OCC with information needed to evaluate the effectiveness of its examination processes, overall supervision, and communication with supervised institutions. The OCC's Office of the Ombudsman, a division independent of the supervision lines of business, administers the collection process to assure bankers of the OCC's interest in obtaining frank comments and alleviate concerns over retaliation or retribution. The OCC Ombudsman promotes OCC/banker communications and resolves problems and conflicts.

The OCC provides each national bank, Federal savings association, and Federal branch or agency with an Examination Survey at the end of its supervisory cycle (12- or 18-month period). This information collection permits banks to assess the OCC's bank supervisory activities, including the:

- Effectiveness of OCC communications with the bank;
- Reasonableness of OCC requests for data and information;
- Quality of OCC decision making during the exam process;
- Professionalism of OCC examining staff; and
- Responsiveness of OCC examiners.

This information collection continues to formalize and promote a long-standing OCC program. The OCC always has given the institutions it supervises the opportunity to provide input regarding the examination process.

2. Use of the information:

The OCC developed the survey at the suggestion of members of the banking industry who expressed a desire to provide examination-related feedback. The Comptroller and OCC supervisory staff considered that suggestion and concurred. Further, the Comptroller and OCC supervisory staff find this information collection to be an important tool for measuring OCC examination performance, designing more efficient and effective examinations, and targeting examiner training.

The OCC Ombudsman follows up on any significant issues raised, whether they pertain to examination procedures, practices, or personnel. The OCC created the Ombudsman position specifically to resolve these types of issues. The OCC Ombudsman regularly performs these tasks.

The OCC Ombudsman and staff receive and process the information submitted but do not release information on individual banks, with other lines of business within the OCC or publicly. The Senior Deputy Comptroller for Mid-size/Community Bank Supervision, the Senior Deputy Comptroller for Large Bank Supervision, and the Chief National Bank Examiner are the primary users of this information.

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

Bankers will be able to complete the survey using a secure web-based data collection tool. The web-based tool is SAS-70 compliant and operates on a FISMA-compliant hosting infrastructure. The tool also enables the development of Section 508 compliant surveys.

4. *Efforts to identify duplication:*

This information collection is unique to the institution and the supervisory cycle. It is not duplicated anywhere.

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

The OCC sends the Examination Survey to all OCC-supervised institutions regardless of asset size. The OCC minimizes the impact of the survey by administering it via a web-based method that allows easy access. In addition, the completion of the survey is voluntary, and institutions may skip any question(s) in the survey.

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

This information collection is conducted only upon completion of a supervisory cycle. Less frequent collection would result in the collection, processing, and follow-up of stale information, impairing the effectiveness of this program.

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

Not applicable.

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

On October 5, 2020, the OCC issued a notice for 60 days of comment concerning the collection, 85 FR 62801. No comments were received.

9. *Payment to respondents:*

None.

10. *Any assurance of confidentiality provided to respondents:*

The OCC Ombudsman receives and processes the information and takes follow-up action, as needed. The OCC Ombudsman does not release information on individual institutions and treats this information as examination-related material.

11. Justification for questions of a sensitive nature:

Not applicable.

12. Burden estimate:

The OCC provides the Examination Survey to bank management at the completion of the institution's 12- or 18-month supervisory cycle. After the issuance of the report of examination (ROE), bank management may comment on the overall supervision provided by the OCC throughout the year.

Number of respondents: 1,714.

Number of responses per respondent: 1.

Burden per response: 10 minutes.

Total burden: 285.66 hours.

Cost of Hour Burden

285.66 Hours x \$115.19 = \$32,905.18

To estimate wages the OCC reviewed May 2019 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 \$115.19 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (3.1 percent as of Q1 2020 according to the BLS), plus an additional 33.4 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2019 for NAICS 522: credit intermediation and related activities).

13. Estimate of annualized cost to respondents:

None.

14. Estimate of annualized cost to the Federal government:

None.

15. Changes in burden:

Current burden: 131 burden hours

Revised burden: 286 burden hours.

Difference: +155 burden hours.

The increase in burden is due to the increase in the number of institutions completing the survey.

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

Not applicable.

17. Reasons for not displaying OMB approval expiration date:

Not applicable.

18. Exceptions to the certification statement:

None.

B. Collections of Information Employing Statistical Methods.

Not applicable.