



January 12, 2021

William Bestani  
Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington, D.C. 20530

Subject: Emergency PRA Clearance Request, Libor Self-Assessment

Dear Mr. Bestani:

The Office of the Comptroller of the Currency (OCC) hereby requests approval for the Libor Self-Assessment pursuant to the Office of Management and Budget's (OMB) Paperwork Reduction Act (PRA) emergency processing procedures at 5 C.F.R. § 1320.13.

The expected cessation of the London InterBank Offered Rate (Libor) by the end of 2021 prompted the OCC to create a self-assessment tool for use by banks in preparing for the expected Libor cessation. There is risk of market disruptions, litigation, and destabilized balance sheets if acceptable replacement rate(s) do not attract sufficient market-wide acceptance or if contracts cannot seamlessly transition to new rate(s).

The ubiquity of LIBOR, present in over \$200T notional contracts, makes moving off the rate incredibly complicated. Many existing contracts do not include sufficient provisions in the event that Libor becomes unavailable. Without preparation, Libor cessation could cause market disruption and present risks to banks and their customers.

Given that we expect banks to discontinue making LIBOR loans by this year end, the prevalence of LIBOR and the remaining work to be done within the timeframe described above, the OCC is requesting emergency clearance for this self-assessment tool to be made available to banks due to the immediate need and the brief duration of use to help banks prepare for Libor-related risk.

The OCC has determined that: (1) the collection of information within the scope of this request is needed prior to the expiration of time periods established under 5 C.F.R. § 1320.12; (2) this collection of information is essential to the mission of the OCC; and (3) the OCC cannot reasonably comply with the normal clearance procedures because an unanticipated event has occurred and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

This information collection may not be cleared through 5 C.F.R. § 1320.11, which covers only collections of information contained in proposed rules. As noted in 5 C.F.R. § 1320.5(c)(1), the OCC must clear the collection under 5 C.F.R. § 1320.10, which relates to information collections not contained in proposed rules or current rules. There is insufficient time to obtain clearance under 5 C.F.R. § 1320.10 as the collection is needed immediately and will not be used after December 31, 2021. Therefore, the OCC is requesting emergency clearance.

Sincerely,

Patrick Tierney  
Assistant Director  
Bank Advisory  
Office of the Comptroller of the Currency