

Supporting Statement
Bank Appeals Follow-Up Questionnaire
OMB Control No. 1557-0332

A. Justification.

1. *Circumstances that make the collection necessary:*

The OCC is committed to assessing its efforts to provide a fair and expeditious appeals process to institutions under its supervision. To perform this assessment, it is necessary to obtain feedback from the individual appellant institutions on the effectiveness of the efforts of the OCC's Office of Ombudsman (Ombudsman) to provide a fair and expeditious appeals process and suggestions on ways to enhance the bank appeals program going forward.

2. *Use of the information:*

For each appeal submitted, the Ombudsman uses the information gathered to assess the appeal's consistency with OCC Bulletin 2013-15, "Bank Appeals Process," dated June 7, 2013, and to enhance its bank appeals program.

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

The OCC administers all bank appeals follow-up questionnaires in an online format.

4. *Efforts to identify duplication:*

This information collection is unique and is not duplicated anywhere.

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

Not applicable.

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

The frequency of this information collection is limited to once per appeal filed by an appellant institution. Less frequent collection would limit the Ombudsman's ability to gauge its progress in addressing issues and enhancing the bank appeals program.

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

Not applicable.

8. Efforts to consult with persons outside the agency:

The OCC issued a notice for 60 days of comment regarding this collection on February 16, 2020, 86 FR 9571. No comments were received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

The information collected is kept private to the extent permitted by law.

11. Justification for questions of a sensitive nature:

Not applicable.

12. Burden estimate:

5 banks @ 1 response per year = 5 responses
5 responses @ 0.17 hours per response = .85 burden hours

Cost of Hour Burden

.85 Hours x 115.19 = \$97.91

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 total annual costs to respondents (excluding cost of hour burden in Item #12):

Not applicable.

14. Estimates of annualized cost to the federal government:

Not applicable.

15. Change in burden:

2.55 hours minus .85 = 1.7 hours

16. Information regarding collections whose results are 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.