

Office of the Comptroller of the Currency
Supporting Statement
Customer Complaint Form
OMB Control No. 1557-0232

A. Justification.

1. *Circumstances that make the collection necessary:*

The customer complaint form was developed as a courtesy for customers who contact the Office of the Comptroller of the Currency's (OCC) Customer Assistance Group (CAG) and wish to file a formal, written complaint. The form offers a template for customers to use to focus their issues and identify the information necessary to provide a complete picture of their concerns. Use of the form is entirely voluntary; however, use of the form does help avoid the processing delays associated with incomplete complaints and allows CAG to process complaints more efficiently.

This collection of information is solicited pursuant to the Federal Trade Commission Act, 15 U.S.C. 57a(f)(1), the purpose of which is to prevent unfair or deceptive acts or practices in or affecting commerce, including acts or practices which are unfair or deceptive to customers by banks. Agencies must establish a separate division of consumer affairs to receive and take appropriate action upon complaints with respect to such acts or practices by banks subject to its jurisdiction.

2. *Use of the information:*

CAG uses the information included in a completed form to create a record of the customer's contact, capture information that can be used to resolve the customer's issues, and provide a database of information that is incorporated into the OCC's supervisory process.

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

Respondents may use any available information technology to complete the form. Customers can access the form at the www.HelpWithMyBank.gov web site. The web site is available to assist customers of national banks or federal savings associations (thrifts) and other financial institutions with questions common to all banking customers. The OCC's www.occ.gov web site also provides a link to the www.HelpWithMyBank.gov web site. Customers have the option to file a complaint using an on-line form for which they will receive an email confirmation or download a PDF form that can be completed and mailed or faxed to the CAG. The on-line form is available in English only, while the PDF form is available in both English and Spanish language formats.

The on-line form contains sections that match the PDF form, which are presented on a

single visible page. Required fields also are highlighted and asterisked for user friendliness. The customer can navigate forwards and backwards through the form using the “Next” and “Previous” links at the bottom of each section. The form contains an on-line certification that replaces the PDF form’s signature line and provides the Privacy Act Statement. Customers are able to print the on-line submission when complete. The on-line form streamlines the customer complaint process by providing a form that is accessible for submission at any time.

4. Efforts to identify duplication:

The information collected is not duplicated elsewhere.

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:

Less frequent collection would substantially impair the effectiveness of the 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 concerning this collection on March 17, 2021, 86 FR 14682. No comments were received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

The solicitation and collection of this information is authorized by 12 U.S.C. 1481, 1464, and 1820; and 15 U.S.C. 41 et seq. It is intended that the information obtained through this solicitation will be used within the OCC and provided to the national bank or federal savings association (thrift) that is the subject of the complaint or inquiry. Additional disclosures of such information may be made, pursuant to the following routine uses, to: (1) other third parties when required or authorized by statute or when necessary in order to obtain additional information relating to the complaint or inquiry; (2) other governmental, self-regulatory, or professional organizations having: (a) jurisdiction over the subject matter of the complaint or inquiry; (b)

jurisdiction over the entity that is the subject of the complaint or inquiry; or (c) whenever such information is relevant to a known suspected violation of law or licensing standard for which another organization has jurisdiction; (3) the Department of Justice, a court, an adjudicative body, a party in litigation, or a witness when relevant and necessary to a legal or administrative proceeding; (4) a Congressional office when the information is relevant to an inquiry; (5) Other governmental or tribal organizations with which an individual has communicated regarding a complaint or inquiry about an OCC-regulated entity; (6) OCC contractors or agents when access to such information is necessary; (7) other third parties when required or authorized by statute; and (8) appropriate agencies, entities and persons when: (a) there has been a suspected or confirmed compromise to the security or confidentiality of the information in the system of records; (b) as a result of the suspected or confirmed compromise there is a risk of harm to economic or property interests, identity theft or fraud, or harm to the security or integrity of the system or other systems that rely on the compromised information; and (c) the disclosure made is reasonably necessary to assist in efforts to respond to the suspected or confirmed compromise and prevent, minimize, or remedy such harm. For a full listing of routine uses, please see 81 F.R. 2945, 2957-8.

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

This information collection contains personally identifiable information. The OCC's Privacy Impact Assessment is included in the Information Collection Request (ICR).

12. *Burden estimate:*

10,000 respondents @ 1 response = 10,000 responses
10,000 responses @ 0.33 hour = 3,300 burden hours

Cost of Hour Burden

3,333 x \$29.45 * = \$98,157

* Average hourly earnings in the U.S.

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:*

Former: 830 hours
New: 3,300 hours
Difference: +2,470 hours

The increase is due to an increase in time to complete the narrative portion of the form.

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

No publication for statistical use is contemplated.

17. *Reasons for not displaying OMB approval expiration date:*

Not applicable.

18. *Exceptions to the certification statement:*

Not applicable.

B. *Collections of Information Employing Statistical Methods.*

Not applicable.