

SUPPORTING STATEMENT
CUSTOMER ASSISTANCE FORMS
(OMB Control No. 3064-0134)

INTRODUCTION

The FDIC is seeking OMB approval to extend, without change, its information collection entitled, “Customer Assistance Forms,” which permits the FDIC to collect information from customers of financial institutions who have inquiries or complaints about an institution. Customers may document their complaints or inquiries to the FDIC using a letter or an optional Customer Assistance Form (6422/04), or an optional Business Assistance Form (6422/11). For questions on FDIC deposit insurance coverage, customers or bankers at an institution may document their inquiry using the FDIC Deposit Insurance Form (6422/15). The forms allow for online completion and submission on the FDIC’s website, although it can still be completed in hard copy and mailed to the FDIC for those who prefer to do so. The current clearance for the collection expires on January 31, 2025. There is no change in the method or substance of the collection.

A. JUSTIFICATION

1. Circumstances that make the collection necessary:

Consumers and bankers who wish to submit their complaints or inquiries to FDIC must do so in writing. The optional online customer assistance forms permit the FDIC to respond to consumers or businesses in an expeditious fashion. Submitting the form directly online will make the data submitted much more accurate.

2. Use of information collected:

The information is used to improve the way FDIC relates to consumers and businesses requesting assistance in resolving their complaint or inquiry. The FDIC uses the information provided on the form to provide a response to the requestor, and to determine the nature of the complaint and inquiry and what financial institution, if any, is involved.

3. Consideration of the use of improved information technology:

The Customer Assistance Form, the Business Assistance Form, and the FDIC Deposit Insurance Form are available for the general public to submit a complaint or inquiry online through use of an interactive form.

4. Efforts to identify duplication:

There is no duplication of reporting. The Customer Assistance Form, the Business Assistance Form, and the FDIC Deposit Insurance Form will allow

consumers or businesses another venue, other than by telephone or writing, to submit a complaint or inquiry.

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

This information collection relates to the burden on the customer for submitting the forms directly to the FDIC, the number of small banking entities affected by this ICR is estimated to be zero.

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

This capability is an optional method of submitting complaints and inquiries to the FDIC for consumers and businesses.

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 Part 1320.5(d)(2).

8. Efforts to consult with persons outside the agency:

A 60-day notice seeking public comment on the FDIC's renewal of the information collection was published on August 21, 2024 (89 FR 67635). No comments were received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

No confidentiality issues anticipated. Any information deemed to be of a confidential nature would be exempt from public disclosure in accordance with the provisions of the Freedom of Information Act (5 U.S.C. 552).

11. Justification for questions of a sensitive nature:

No sensitive information is collected.

12. Estimate of hour burden including annualized hourly costs:

Summary of Estimated Annual Implementation Burden						
IC Description	Type of Burden (Obligation to Respond)	Frequency of Response	Number of Respondents	Number of Responses / Respondent	Estimated Time per Response (Hours)	Annual Burden (Hours)
Customer Assistance Form (6422/04)	Reporting (Voluntary)	On Occasion	8,566	1	0.25	2,142
Business Assistance Form (6422/11)	Reporting (Voluntary)	On Occasion	1,191	1	0.25	298
FDIC Deposit Insurance Form (6422/15)	Reporting (Voluntary)	On Occasion	1,465	1	0.25	366
Total Annual Burden Hours:					2,806 hours	
Source: FDIC.						

Hourly Burden Cost Estimate

Because the ICs contained in this ICR apply to the general public, instead of estimating the hourly burden cost using a composite of specific occupations in the Credit Intermediation and Related Activities Industry, FDIC uses the total estimated hourly compensation for all occupations across all industries as described below.

To estimate the average cost of compensation per hour, FDIC uses the 75th percentile hourly wages reported by the Bureau of Labor Statistics (BLS) National Industry-Specific Occupational Employment and Wage Estimates (OEWS) for “All Occupations” in the “Cross-Sector” industry. However, the latest OEWS wage data are as of May 2023 and do not include non-wage compensation. To adjust these wages for use in this estimate, FDIC multiplies the OEWS hourly wages by approximately 1.42 to account for non-wage compensation among privately employed workers, using the BLS Employer Cost of Employee Compensation (ECEC) data as of March 2023 (the latest published release prior to the OEWS wage data). It then multiplies the resulting compensation rates by approximately 1.04 to account for the change in the seasonally adjusted Employment Cost Index covering privately employed workers for all industries and all occupations between March 2023 and March 2024.

Based on this methodology FDIC estimates a total cost of compensation per hour equal to \$54.63, less than the 2021 estimate of \$60.37. However, the 2021 estimate arrived at a total estimated hourly compensation estimate by using the same OEWS estimate described above, then adjusting it according to benefits data from the ECEC specific to the Credit Intermediation and Related Activities industry and by the Consumer Price Index for All Urban Consumers rather than the ECI. Therefore, the two estimates differ. Based on its analysis, the share of benefits in total compensation is lower across all private industry workers than in the Credit Intermediation industry and the increase in employment costs as measured by the ECI between March 2023 and March 2024 is lower across all private industry workers than the increase in the Credit Intermediation Industry.

Total Estimated Cost Burden

FDIC estimates the total annual cost burden for OMB 3064-0134 by multiplying the total annual estimated burden hours reported in Table 1 by the hourly compensation estimate reported above. The total annual cost burden is estimated as: 2,806 hours / year * \$54.63/ hour = \$153,298 per year. This estimated cost burden constitutes an increase of \$64,675 from the estimated cost burden reported in the 2021 ICR. This increase is due to the increase in the estimated number of annual respondents and is partially attenuated by the decrease in the estimated hourly compensation rate.

13. Estimate of start-up cost to respondents:

There are no anticipated capital, start-up, or operating costs.

14. Estimates of annualized cost to the federal government:

None.

15. Analysis of change in burden:

There is no change to the substance of this information collection. See section 12 above.

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

The information contained in this collection is not published.

17. Exceptions to expiration date display:

Not applicable.

18. Exceptions to certification:

None.

B. STATISTICAL METHODS

Statistical methods are not employed in this collection.