SUPPORTING STATEMENT OMBUDSMAN POST-EXAMINATION SURVEYS (3064-0218)

INTRODUCTION

The Federal Deposit Insurance Corporation (FDIC) is requesting OMB approval for a three-year renewal of the information collection related to quality-of-service surveys intended to assess the effectiveness of the agency's financial institution examination process and to elicit comments and recommendations to improve the examination program. The current clearance for the collection expires on May 31, 2025. There is no change in the method or substance of the collection.

A. <u>JUSTIFICATION</u>

1. <u>Circumstances that make the collection necessary:</u>

The Federal Deposit Insurance Act authorizes the Federal Deposit Insurance Corporation "[t]o make examinations of and to require information and reports from depository institutions."¹ The Federal Deposit Insurance Corporation conducts bank examinations to ensure public confidence in the banking system and to protect the Deposit Insurance Fund. Maintaining public confidence in the banking system is essential because customer deposits are a primary funding source that depository institutions use to meet fundamental objectives such as providing financial services. Safeguarding the integrity of the Deposit Insurance Fund is necessary to protect customers' deposits and resolve failed banks.

Onsite examinations help ensure the stability of insured depository institutions by identifying undue risks and weak risk management practices. Examination activities center on evaluating an institution's capital, assets, management, earnings, liquidity, and sensitivity to market risk. Evaluating a bank's adherence to laws and regulations is also an important part of bank examinations and is given high priority by Congress and bank supervisors. Bank examinations also play a key role in the supervisory process by helping the FDIC identify the cause and severity of problems at individual banks and emerging risks in the financial-services industry. The accurate identification of existing and emerging risks helps the FDIC develop effective corrective measures for individual institutions and broader supervisory strategies for the industry.

The purpose of the post- examination surveys is to gauge bankers' views on the effectiveness and quality of FDIC Safety and Soundness and Consumer Compliance examinations, as well as to identify ways to improve the examination process. Respondents will be asked to voluntarily rate the efficiency of the pre-examination process; examiners' professionalism and understanding of the laws

^{1 12} U.S.C. 1819(a), Eighth.

and regulations; the examination process; and examination report quality. Respondents will also be allowed to provide feedback on any areas for improvement and will be given an option to have someone from the FDIC's Office of the Ombudsman contact the institution confidentially about its recent examination or any other matters.

2. <u>Use of the information:</u>

The information will be used to enable the FDIC to identify and address issues relating to and to improve the agency's financial institution examination program.

3. <u>Consideration of the use of improved information technology:</u>

Institutions are free to use whatever methods are the least burdensome for them to respond to the survey. They can respond on the survey form or elect to initiate inperson contact with a representative from the FDIC's Office of the Ombudsman.

4. <u>Efforts to identify duplication:</u>

The information required by this collection is not available elsewhere.

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

The information collection will not have a significant impact on a substantial number of small entities. Responses are voluntary and will only be requested from the relatively small number of financial institution that are examined within a given exam cycle. The time per response is estimated to be a low burden.

6. <u>Consequences to the Federal program if the collection were conducted less</u> <u>frequently:</u>

The collection of information is voluntary and occurs only on the occasion of a safety and soundness or consumer compliance examination. In the absence of this information collection, the agency would not be able to include the financial institution's perspective on the effectiveness and quality of its examination program.

7. <u>Special circumstances necessitating collection inconsistent with 5 CFR Part</u> <u>1320.5(d)(2):</u>

There are no special circumstances. This information collection is conducted in accordance with the guidelines in 5 CFR 1320.5(d)(2).

8. <u>Efforts to consult with persons outside the agency:</u>

On March 25,2025 FDIC published a Federal Register notice seeking public comment for a 60-day period (90 FR 13600). No comments were received.

9. <u>Payments or gifts to respondents:</u>

None.

10. <u>Any assurance of confidentiality:</u>

Confidential information will be kept private to the extent allowed by law.

11. <u>Justification for questions of a sensitive nature:</u>

The information collection does not request information of a sensitive nature.

12. <u>Estimate of hour burden including annualized hourly costs:</u>

Summary of Estimated Annual Burden (OMB No. 3064-0218)							
Information Collection (IC) (Obligation to Respond)	Type of Burden (Frequency of Response)	Number of Respondents	Number of Responses per Respondent	Average Time per Response (HH:MM)	Annual Burden (Hours)		
1.Safety and Soundness Post-Examination Survey (Voluntary)	Reporting (Annual)	492	1	00:45	369		
2. Consumer Compliance Post-Examination Survey (Voluntary)	Reporting (Annual)	329	1	00:45	247		
Total Annual Burden (Hours): 616							
Source: FDIC.							

Summary of Hourly Burden Cost Estimate (OMB No. 3064-0218)								
Information Collection Hou		Percentage Shares of Hours Spent by and Hourly Compensation Rates for each Occupation Group (by Collection)						Estimated Hourly
(IC) (Obligation to Respond)	(%)	Exec. & Mgr. (\$149.41)	Lawyer (\$186.16)	Compl. Ofc. (\$78.8)	IT (\$113.4)	Fin. Anlst. (\$102.54)	Clerical (\$40.28)	Compensatio n Rate
1.Safety and Soundness Post- Examination Survey	59.90	100	0	0	0	0	0	\$149.41

(Voluntary)								
2. Consumer Compliance Post- Examination Survey (Voluntary)	40.10	50	0	50	0	0	0	\$114.11

Weighted Average Hourly Compensation Rate:

\$135.26

Source: Bureau of Labor Statistics: 'National Industry-Specific Occupational Employment and Wage Estimates: Industry: Credit Intermediation and Related Activities (5221 And 5223 only)' (May 2023), Employer Cost of Employee Compensation (March 2023), and Employment Cost Index (March 2023 and December 2024). Standard Occupational Classification (SOC) Codes: Exec. And Mgr = 11-0000 Management Occupations; Lawyer = 23-0000 Legal Occupations; Compl. Ofc. = 13-1040 Compliance Officers; IT = 15-0000 Computer and Mathematical Occupations; Fin. Anlst. = 13-2051 Financial and Investment Analysts; Clerical = 43-0000 Office and Administrative Support Occupations.

Total Estimated Cost Burden (OMB No. 3064-0218)						
Information Collection Request	Annual Burden (Hours)	Weighted Average Hourly Compensation Rate	Annual Respondent Cost			
Post Examination Surveys	616	\$135.26	\$83,320			
Total Annual Respondent Cost: \$83,320						
Source: FDIC.						

13. <u>Capital, Start-up, Operating, and Maintenance Estimate of Start-up Costs to</u> <u>Respondents:</u>

None.

14. <u>Estimate of annualized costs to the federal government:</u>

None.

15. <u>Analysis of change in burden:</u>

There is no change in the method or substance of the collection. The overall decrease in burden hours (from 867 hours to 616 hours) is the result of economic fluctuation. In particular, the estimated number of responses per respondent has decreased while the hours per response remained the same.

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

The results of this collection will not be published for statistical use.

- 17. <u>Display of expiration date:</u> Not applicable.
- 18. <u>Exceptions to certification</u>

None.

B. <u>STATISTICAL METHODS</u>

Not Applicable