

**Supporting Statement for the
Census of Finance Companies and Other Lenders and Survey of Finance Companies
(FR 3033p and FR 3033s; OMB No. 7100-0277)**

Summary

The Board of Governors of the Federal Reserve System (Board), under authority delegated by the Office of Management and Budget (OMB), has extended for three years, with revision, the Census of Finance Companies and Other Lenders and Survey of Finance Companies (FR 3033p and FR 3033s; OMB No. 7100-0277). The FR 3033p is the first part of a two-stage survey series, which is a census survey designed to identify the universe of finance companies eligible for potential inclusion in the FR 3033s. It gathers limited information including total assets, areas of specialization, and information on the corporate structure of such companies. The second part of this information collection, the FR 3033s, collects balance sheet data on major categories of consumer and business credit receivables and major liabilities, along with income and expenses, and is used to gather information on the scope of a company's operations and loan and lease servicing activities. The data collected from this voluntary survey will be used for two purposes: to benchmark the consumer and business finance series collected on the Board's monthly Domestic Finance Company Report of Consolidated Assets and Liabilities (FR 2248; OMB No. 7100-0005) and to increase the Federal Reserve's understanding of an important part of the financial system.

The Board revised the FR 3033p by removing an opt-in option and mortgage companies from the respondent panel, revising the wording of several questions, and adding the request of RSSD ID and the Nationwide Multistate Licensing System & Registry (NMLS) ID, when applicable. There were no revisions to the FR 3033s as part of this clearance.

The current estimated total annual burden for the FR 3033p and FR 3033s (collectively, the quinquennial) is 5,124 hours, and would decrease to 3,540 hours. The revisions would result in a decrease of 1,584 hours. The form and instructions are available on the Board's public website at <https://www.federalreserve.gov/apps/reportingforms>.

Background and Justification

Since June 1955, the Board has surveyed the assets and liabilities of finance companies in five-year intervals. For purposes of this survey, finance companies were defined as companies whose largest portion of assets is made up of consumer or business loans or leases excluding commercial banks, cooperative banks, investment banks, savings banks, savings and loan institutions and industrial loan corporations or their subsidiaries. Through 1975, all known U.S. finance companies were surveyed. To reduce reporting burden, in 1980 the survey was split into two parts: (1) an extremely brief screening survey, which has been sent to all likely finance companies that operate in the United States and its territories and possessions and (2) a longer survey, which has been sent to a stratified random sample of identified finance companies. In 2005, the definition of finance company was revised to include companies whose largest portion of assets was made up of real estate loans; as a result, mortgage companies became eligible to

participate in the survey. In addition, the survey was revised to instruct finance companies to include the assets and liabilities of their mortgage company subsidiaries.

In 2010, the FR 3033p and FR 3033s underwent a major revision. The title of the FR 3033p was changed to “Census of Finance Companies” to stress that every response is important. Several questions on the census were modified to allow the Board to make the determination of whether a company is a finance company rather than asking whether it meets the definition. Similarly, the title of the FR 3033s was changed to “Survey of Finance Companies.” Revisions to the FR 3033s included reordering assets and liability data items from most liquid to least liquid, asking additional detail on assets and liabilities, adding a section to gather information on servicing activities and geographic distribution of the company’s activities, and creating a clearer distinction among the broad balance sheet data items, detailed loan and lease data items, and off-balance-sheet securitization data items. The respondent panel sizes for both questionnaires were increased, and the Board implemented a web-based survey option.

The Board has used the quinquennial data to benchmark monthly data series on major assets and quarterly data series on liabilities of finance companies developed from the FR 2248, which is collected from a smaller sample of companies. These data are used in internal analysis and are reported to the public in two monthly statistical releases, *Finance Companies* (G.20) and *Consumer Credit* (G.19), as well as the quarterly *Financial Accounts of the United States* (Z.1) release. As with many data series based on a fixed sample, errors of estimation tend to increase over time and thus require periodic correction. These errors reflect the evolution in the financial markets as new companies enter the market and market shares change and the deterioration of the monthly sample panel as respondents close, merge or otherwise leave the panel.

In addition to benchmarking the aforementioned data series, information from the quinquennial also provides the Board with an opportunity to learn about an important part of the financial system. It is the only statistically reliable source of information on the types of finance companies and the size of the industry. There is no other comprehensive source of data on the activities of such companies. Finance companies are a key supplier of credit to households and businesses, which is monitored by the Board and the Federal Open Market Committee (FOMC) in the implementation of monetary policy. Specifically, the FR 3033p allows the Board to select more appropriate respondents for the FR 3033s and ultimately benchmark the FR 2248 accurately. Conducting the census less frequently would not provide the Board with timely enough information to accomplish its goals and mission.

Description of Information Collection

FR 3033p

The FR 3033p is a voluntary census survey designed to identify the universe of finance companies eligible for potential inclusion in the FR 3033s and to enable the stratification of the sample for more statistically efficient estimation. The FR 3033p is currently composed of 7 questions to assess the company’s asset size, level of loan and lease activity, company structure, and licensing authority.

FR 3033s

From the universe of finance companies identified by the FR 3033p, a sample of finance companies will be invited, on a voluntary basis, to fill out the FR 3033s. From these finance companies, the FR 3033s survey collects balance sheet data on major categories of consumer and business credit receivables and major liabilities. In addition, the survey may be used to gather information on topics that are pertinent to increasing the Federal Reserve's understanding of the finance companies.

The Board understands that respondents use information technology to comply with these provisions, including utilizing a web portal to allow collecting responses online. Respondents can also send in their responses in PDF to the project email inbox. Having multiple methods for the electronic submission of responses encourages participation from all the respondents.¹

Respondent Panel

Currently, the Board is in the process of identifying the potential universe of finance companies. There is no national registry of finance companies to serve as the sample frame for the FR 3033p. In 2020, a sample frame was obtained primarily from a commercial data vendor and, to a lesser degree, from other sources. There were a substantial number of the census forms returned by the post office as undeliverable. The Board is currently working to identify the vendor(s) with the best coverage of companies that are likely to meet the definition of a finance company.

The Board estimates up to 30,000 companies that, based on results from the 2020 census, may meet the requirements for forming a sample frame. The Board would mail census forms to all these companies. Once the companies return the census, the Board would determine the panel of respondents for inclusion in the FR 3033s.

To improve the response rate for the census, which has been trending lower in the past two decades, the Board is planning to conduct census mailings based on experience from other surveys. The current plan includes a pre-survey notification letter, initial mailing, a second wave mailing of the entire survey package to nonrespondents, and postcard reminders after each wave of mailing, as needed.

To cope with the expected level of nonresponse to the census, the Board also intends to select a subsample of nonrespondents for further follow-up. The Board, along with Federal Reserve Banks, anticipate following up on 4,000 nonrespondents for the census.

To minimize burden on all respondents, only the necessary questions to determine if a company meets the definition of a finance company are included in the FR 3033p.

¹ Respondents also have the option to submit their responses in a hardcopy format via mail.

Frequency and Time Schedule

The Board conducts the quinquennial every five years. The FR 3033p census will be sent out to respondents in May 2025.

Revisions to the FR 3033p

The Board revised the FR 3033p to improve the accuracy of identifying finance companies and improve response rates; the FR 3033s is not being revised as part of this clearance. The FR 3033p revisions, which would be effective for the May 2025 survey date, include:

- Removing the mortgage companies from the universe of finance companies. This is a sector that has been included since the 2005 survey. With an external data source being available, staff believe it is appropriate to exclude the sector now.
- Removing the “opt-in” option of “Please check this box if you would like to receive an email notification when the results of this survey are available.”
- Revising the first response option of question 5 to read “Commercial bank, cooperative bank, credit union, savings bank, or savings and loan association. Please provide the RSSD ID if available:” By including a request for the unique identifier assigned to depository institutions, this approach will help us better verify and screen out depository institutions.
- Revising the second response option of question 5 to read “Bank holding company (a company that owns a controlling interest in one or more banks but does not itself offer banking services). Please provide the RSSD ID if available:” By including a request for the unique identifier assigned to the bank holding company, this approach will help us better verify information provided to the survey.
- Revising the fourth response option of question 5 to read “None of the above. Please provide the NMLS ID if available:” By including a request for the unique identifier assigned by the Nationwide Multistate Licensing System, this approach will help us match against internal data and assist proper identification of finance companies.
- Revising the first response option to read “Is your PARENT company licensed by a state or federal authority as a” in question 6 so that it reads “Commercial bank, cooperative bank, credit union, savings bank, or savings and loan association. Please provide the RSSD ID if available:” By including a request for the unique identifier assigned to depository institutions, this approach will help us better verify and screen out depository institutions.
- Revising the second response option to read “Is your PARENT company licensed by a state or federal authority as a” in question 6 so that it reads “Bank holding company (a company that owns a controlling interest in one or more banks but does not itself offer banking services. Please provide the RSSD ID if available:”. By including a request for the unique identifier assigned to the bank holding company, this approach will help us better verify information provided to the survey.
- Revising the fourth response option to read “Is your PARENT company licensed by a state or federal authority as a” in question 6 so that it reads “None of the above. Please provide the NMLS ID if available.” By including a request for the unique identifier

assigned by the Nationwide Multistate Licensing System and Registry, this approach will help us match against internal data and assist proper identification of finance companies.

Public Availability of Data

The Board has used the quinquennial data to benchmark monthly data series on major assets and quarterly data series on liabilities of finance companies developed from the FR 2248, which is collected from a smaller sample of companies. Examples of analysis are published in the Federal Reserve Bulletin² and a FEDS Note.³ These data are also reported in aggregate format to the public in two monthly statistical releases, *Finance Companies* (G.20) and *Consumer Credit* (G.19), as well as the quarterly *Financial Accounts of the United States* (Z.1) release. Individual survey responses are not made publicly available.

Legal Status

The FR 3033p and FR 3033s are authorized pursuant to sections 2A and 12A of the Federal Reserve Act (FRA). Section 2A of the FRA requires that the Board and FOMC maintain long-run growth of the monetary and credit aggregates commensurate with the economy's long run potential to increase production, so as to promote effectively the goals of maximum employment, stable prices, and moderate long-term interest rates (12 U.S.C. § 225a). Under section 12A of the FRA, the FOMC is required to implement regulations relating to the open market operations conducted by Federal Reserve Banks with a view to accommodating commerce and business and with regard to their bearing upon the general credit situation of the country (12 U.S.C. § 263). Information collected from the FR 3033p and FR 3033s is used to fulfill these obligations. The FR 3033p and FR 3033s are voluntary.

The information collected pursuant to the FR 3033p and FR 3033s is confidential pursuant to exemption 4 of the Freedom of Information Act (5 U.S.C. § 552(b)(4)), which protects nonpublic commercial or financial information, which is both customarily and actually treated as private by the respondent.

Consultation Outside the Agency

There has been no consultation outside the Federal Reserve System.

Public Comments

On December 23, 2024, the Board published an initial notice in the *Federal Register* (89 FR 104541) requesting public comment for 60 days on the extension, with revision, of the FR 3033p and FR 3033s. The comment period for this notice expired on February 21, 2025. The Board did not receive any comments. The Board adopted the extension, with revision, of the FR 3033p and FR 3033s as originally proposed. On April 30, 2025, the Board published a final notice in the *Federal Register* (90 FR 17932).

² <https://www.federalreserve.gov/publications/2018-june-survey-of-finance-companies-2015.htm>.

³ <https://www.federalreserve.gov/econres/notes/feds-notes/the-cost-structure-of-consumer-finance-companies-and-its-implications-for-interest-rates-20200812.htm>.

Estimate of Respondent Burden

As shown in the table below, the estimated total annual burden for the FR 3033p and FR 3033s is 5,124 hours, and would decrease to 3,540 hours with the revisions. The number of respondents is estimated based on the average number of respondents in the past 10 years. The FR 3033p burden estimate is based on the standard Board burden calculation methodology. Because the FR 3033s was not revised as part of this clearance, the FR 3033s burden estimate will be updated in a future clearance. These reporting requirements represent less than 1 percent of the Board's total paperwork burden.

FR 3033	<i>Estimated number of respondents⁴</i>	<i>Estimated annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
Current				
FR 3033p	12,800	1	0.33	4,224
FR 3033s	900	1	1	<u>900</u>
<i>Current Total</i>				5,124
Proposed				
FR 3033p	8,000	1	0.33	2,640
FR 3033s	900	1	1	<u>900</u>
<i>Proposed Total</i>				3,540
<i>Change</i>				(1,584)

The estimated total annual cost to the public for the FR 3033p and FR 3033s is \$369,697, and would decrease to \$255,411 with the revisions.⁵

Sensitive Questions

This information collection contains no questions of a sensitive nature, as defined by OMB guidelines.

⁴ Of these respondents, 7,200 FR 3033p are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$850 million in total assets). Size standards effective March 17, 2023. See <https://www.sba.gov/document/support-table-size-standards>. There are no special accommodations given to mitigate the burden on small institutions.

⁵ Total cost to the responding public is estimated using the following formula: total burden hours, multiplied by the cost of staffing, where the cost of staffing is calculated as a percent of time for each occupational group multiplied by the group's hourly rate and then summed (30% Office & Administrative Support at \$24, 45% Financial Managers at \$87, 15% Lawyers at \$88, and 10% Chief Executives at \$126). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor Statistics (BLS), *Occupational Employment and Wages*, May 2024, published April 2, 2025, <https://www.bls.gov/news.release/ocwage.t01.htm>. Occupations are defined using the BLS Standard Occupational Classification System, <https://www.bls.gov/soc/>.

Estimate of Cost to the Federal Reserve System

The estimated cost to the Federal Reserve System for collecting and processing this information collection is \$237,900.