

SUPPORTING STATEMENT
INTERAGENCY APPRAISAL COMPLAINT FORM
(OMB Control No. 3064-0190)

INTRODUCTION

The Appraisal Complaint Form is an interagency form jointly developed by the FDIC, the Office of the Comptroller of the Currency (OCC), the National Credit Union Association (NCUA), and the Federal Reserve Board (FRB). The form was developed for those who wish to file a formal, written complaint that an entity subject to the jurisdiction of one or more agencies has failed to comply with the appraisal independence standards or the Uniform Standards of Professional Appraisal Practice (USPAP). The information collection expires on August 31, 2025.

A. JUSTIFICATION

1. Circumstances that make the collection necessary:

As provided in section 1473(p) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank Act), on January 12, 2011, the Appraisal Subcommittee (ASC), of the Federal Financial Institutions Examination Council (FFIEC) determined that no national hotline existed to receive complaints of non-compliance with appraisal standards. A notice of that determination was published in the **Federal Register** on January 28, 2011 (76 FR 5161). As required by the Dodd-Frank Act, the ASC established a hotline to refer complaints to appropriate state and Federal regulators. For those instances where the ASC determines the FDIC, OCC, FRB, or NCUA is the appropriate regulator, the agencies developed the Interagency Appraisal Complaint Form as a means to efficiently collect necessary information.

2. Use of information collected:

The Interagency Appraisal Complaint Form is designed to collect information necessary for one or more agencies to take further action on a complaint from an appraiser, an individual, a financial institution, or other entities. The FDIC will use the information to take action on the complaint to the extent it relates to an issue within its jurisdiction.

3. Consideration of the use of improved information technology:

The Appraisal Complaint Form is available for members of the general public to submit their complaints or inquiries via an interactive form on the Internet.

4. Efforts to identify duplication:

There is no duplication. The ASC Hotline and Appraisal Complaint Form have been developed in response to an ASC determination that no national hotline

exists to receive complaints of noncompliance with appraisal independence standards or the USPAP.

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

This collection does not have a significant impact on a substantial number of small entities.

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 by appraisers, individuals, and other entities.

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 April 25, 2025 (90 FR 17433). No comments were received.

9. Payments or gifts to respondents:

None.

10. Any assurance of confidentiality:

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

11. Justification for questions of a sensitive nature:

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

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12. Estimate of hour burden including annualized hourly costs:

Summary of Estimated Annual Burden (OMB No. 3064-0190)					
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. Interagency Appraisal Complaint Form, 12 U.S.C 3351 (Voluntary)	Reporting (On Occasion)	62	1	00:30	31
Total Annual Burden (Hours):					31
Source: FDIC.					

Summary of Hourly Burden Cost Estimate (OMB No. 3064-0190)								
Information Collection (IC) (Obligation to Respond)	Hourly Weight (%)	Percentage Shares of Hours Spent by and Hourly Compensation Rates for each Occupation Group (by Collection)						Estimated Hourly Compensation Rate
		Exec. & Mgr. (\$149.41)	Lawyer (\$186.16)	Compl. Ofc. (\$78.8)	IT (\$113.4)	Fin. Anlst. (\$102.54)	Clerical (\$40.28)	
1. Interagency Appraisal Complaint Form, 12 U.S.C 3351 (Voluntary)	100.00	20	0	40	0	0	40	\$77.51
Weighted Average Hourly Compensation Rate:								\$77.51

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.

Note: The estimated hourly compensation rate for a given IC is the average of the hourly compensation rates for the occupations used to comply with that IC, weighted by the estimated share of hours spent by each occupation. The weighted average hourly compensation rate for the entire ICR is the average of the estimated hourly compensation rates for all ICs, weighted by the share of hourly burden for IC. These hourly weights, as shown in the "Hourly Weight" column of this table, are the quotients of the estimated number of annual burden hours for each IC and the total estimated number of annual burden hours across all ICs.

Total Estimated Cost Burden (OMB No. 3064-0190)

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Information Collection Request	Annual Burden (Hours)	Weighted Average Hourly Compensation Rate	Annual Respondent Cost
Interagency Appraisal Complaint Form	31	\$77.51	\$2,403
Total Annual Respondent Cost:			\$2,403
Source: FDIC.			

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

None.

14. Estimates of annualized cost to the federal government:

None.

15. Analysis of change in burden:

There is no change in the method or substance of the collection. The overall decrease in burden hours (from 58 hours to 31 hours) is the result of a decrease in the estimated number of respondents.

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

Not Applicable