

**Supporting Statement
Interagency Appraisal Complaint Form
OMB Control No. 1557-0314**

A. Justification.

1. Circumstances that make the collection necessary:

Section 1473(p) of the Dodd-Frank Wall Street Reform and Consumer Protection Act¹ provides that the Appraisal Subcommittee (ASC) of the Federal Financial Institutions Examination Council (FFIEC) shall establish and operate a national hotline (ASC Hotline) to receive complaints of non-compliance with the appraisal independence standards of the Uniform Standards of Professional Appraisal Practice (USPAP) if the ASC determines, six months after enactment of that section (*i.e.*, January 21, 2011), that no such hotline exists. The statute requires that the ASC Hotline include a toll-free telephone number and an email address. Section 1473(p) further directs the ASC to refer complaints received through the ASC Hotline to the appropriate government bodies for further action, which may include referrals to the Federal Reserve Board (Board), the National Credit Union Administration (NCUA), the Consumer Financial Protection Bureau (CFPB), and state agencies. On January 12, 2011, the ASC determined that a national appraisal hotline did not exist, and a notice of that determination was published in the **Federal Register** on January 28, 2011, (76 FR 5161). As a result, the ASC established a hotline to refer complaints to appropriate federal and state regulators.

Representatives from the OCC, the Board, the FDIC, the NCUA, and the CFPB (Agencies) met and established a process to facilitate the referral of complaints received through the ASC Hotline to the appropriate federal financial institution regulatory agency or agencies. The Agencies developed the Interagency Appraisal Complaint Form (IACF) to collect information necessary to take further action on the complaint.

2. Use of the Information:

The IACF was developed for use by those who wish to file a formal, written complaint that an entity subject to the jurisdiction of one or more of the Agencies has failed to comply with the appraisal independence standards or USPAP. The IACF is designed to collect the information necessary for the Agencies to take further action on a complaint from an appraiser, other individual, financial institution, or other entities. The Agencies use the information to take further action on the complaint to the extent the complaint relates to an issue within their jurisdiction.²

3. Consideration of the use of improved information technology:

¹ Dodd-Frank Wall Street Reform and Consumer Protection Act section 1473, Pub. L. 111-203, 124 Stat. 1376, July 21, 2010; 12 U.S.C. 3351(i).

² The Board, FDIC, and NCUA renew their IACF collection approvals separately under OMB Control Nos. 7100-0135, 3064-0190, and 3133-0200, respectively. The CFPB incorporated the process into one of their existing systems.

Respondents may use any technology that allows compliance with the collection. Also, the IACF can be filed electronically through the OCC's Internet website, www.helpwithmybank.gov.³

4. *Efforts to identify duplication:*

The information is not duplicated elsewhere.

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

This information collection imposes only the minimum burden necessary to meet the goals of the collection.

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

The information collection is the minimum necessary to ensure compliance with the law and safety and soundness requirements.

7. *Special Circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR part 1320:*

The information collection is conducted in accordance with the requirements of 5 CFR Part 1320.

8. *Efforts to consult with persons outside the agency:*

The OCC issued a 60-day *Federal Register* notice on May 14, 2025, 90 FR 20550. 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

³ https://occservices.occ.gov/csp?id=camp_appraisal_complaint_submission

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 FR 2945, 2957-8.

11. Justification for questions of a sensitive nature:

This information collection contains personally identifiable information. Submission of information is voluntary but without the requested information, the OCC may not be able to process the complaint.

12. Burden estimate:

Estimated Number of Respondents: 65.

Estimated Burden per Response: 0.5 hours.

Estimated Total Annual Burden: 32.5 hours (Rounded up to 33 hours by ROCIS, the system that OMB uses for PRA tracking).

Cost of Hour Burden

33 hours x \$131.10 = \$4,326.30

To estimate wages the OCC reviewed May 2024 data for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for credit intermediation and related activities (NAICS 5220A1). To estimate compensation costs associated with the rule, the OCC uses \$131.10 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (3.6 percent as of Q1 2025), plus an additional 35.6 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2024 for NAICS 522: credit intermediation and related activities).

13. Estimate of total annual costs to respondents (excluding cost of hour burden in Item #12):

None.

14. *Estimate of annualized costs to the federal government:*

None.

15. *Change in burden:*

Current burden: 50 hours.

Revised burden: 33 hours

Difference: -17 hours

The decrease in burden is due to a fewer number of complaints filed.

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

The OCC has no plans to publish the information for statistical purposes.

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

Not applicable.

18. *Exceptions to Certification for Paperwork Reduction Act Submissions*

None.

B. Collection of Information Employing Statistical Methods.

Not applicable.