

Supporting Statement
Stress Testing Rules for National Banks and Federal Savings Associations
OMB Control No. 1557-0343

A. Justification.

1. Circumstances that make the collection necessary:

On October 9, 2012, the Office of the Comptroller of the Currency (OCC) issued a Final Rule titled “Annual Stress Test”¹ implementing Section 165(i) of the Dodd-Frank Wall Street Reform and Consumer Protection Act² (“Dodd-Frank Act”). That section requires certain companies to conduct stress tests. As enacted by the Dodd-Frank Act, national banks and Federal savings associations with total consolidated assets of more than \$10 billion were required to conduct annual stress tests and comply with reporting and disclosure requirements under the rule. The reporting templates for institutions with total consolidated assets of over \$50 billion were finalized in 2012.³

Section 165(i)(2) of the Dodd-Frank Act requires certain financial companies, including national banks and Federal savings associations, to conduct annual stress tests⁴ and requires the primary financial regulatory agency⁵ of those financial companies to issue regulations implementing the stress test requirements.⁶

Under section 165(i)(2), a covered institution was required to submit to the Board of Governors of the Federal Reserve System (Board) and to its primary financial regulatory agency a report at such time, in such form, and containing such information as the primary financial regulatory agency may require.⁷

The Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA), enacted on May 24, 2018, amended certain aspects of the company-run stress testing requirement in section 165(i)(2) of the Dodd-Frank Act.⁸ Specifically, section 401 of EGRRCPA raises the minimum asset threshold for financial companies covered by the company-run stress testing requirement from \$10 billion to \$250 billion in total consolidated assets; revises the requirement for banks to conduct stress tests “annually” and instead requires them to conduct stress tests “periodically”; and no longer requires the OCC to provide an “adverse” stress-testing scenario, thus reducing the number of required stress test scenarios from three to two.

¹ 77 FR 61238 (October 9, 2012) (codified at 12 CFR Part 46).

² Dodd-Frank Wall Street Reform and Consumer Protection Act, Pub. L. No. 111-203, 124 Stat. 1376 (2010).

³ 77 FR 49485 (August 16, 2012); 77 FR 66663 (November 6, 2012).

⁴ 12 USC 5365(i)(2)(A).

⁵ 12 USC 5301 (12).

⁶ 12 USC 5365(i)(2)(C).

⁷ 12 USC 5365(i)(2)(B).

⁸ Pub. L. 115-174, 132 Stat. 1296-1368 (2018).

2. Use of the information:

The OCC uses the information to assess the reasonableness of the stress test results and provide forward-looking information to the OCC regarding a covered institution's capital adequacy. The OCC also may use the results of the stress tests to determine whether additional analytical techniques and exercises could be appropriate to identify, measure, and monitor risks at the covered institution. The stress test results support ongoing improvement in a covered institution's stress testing practices with respect to its internal assessments of capital adequacy and overall capital planning.

Under 12 CFR 46.6(c), each covered institution is required to establish and maintain a system of controls, oversight, and documentation, including policies and procedures, describing the covered institution's stress test practices and methodologies, and processes for validating and updating the covered institution's stress test practices. The board of directors of the covered institution must approve and review these policies at least annually. Section 46.7(a) requires each covered institution to report the results of their stress tests to the OCC annually. Section 46.8(a) requires that a covered institution publish a summary of the results of its annual stress tests on its website or in any other forum that is reasonably accessible to the public.

The 2019 increase in the applicability threshold for these requirements⁹ reduced the estimated number of respondents. In addition, the frequency of these reporting, recordkeeping, and disclosure requirements for some institutions were decreased to biennial.

3. Consideration of the use of improved information technology:

Respondents may use any technology that allows compliance with the collection.

4. Efforts to identify duplication:

The information is not duplicated elsewhere.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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:

A less frequent collection would impair the effectiveness of the federal program and thereby impede the agency from fulfilling its responsibilities.

⁹ 84 FR 54472 (October 10, 2019).

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 November 24, 2025, 90 FR 53059. No comments were received.

9. Payment or gift to respondents:

None.

10. Any assurance of confidentiality:

None.

11. Justification for questions of a sensitive nature:

There are no questions of a sensitive nature.

12. Burden estimate:

	Responses	Hours
<i>Recordkeeping (biennial testing)</i>	5	1600 Hours
<i>Recordkeeping (annual testing)</i>	4	2560 Hours
Total Recordkeeping:		4160 Hours
<i>Reporting (biennial testing)</i>	5	600 Hours
<i>Reporting (annual testing)</i>	4	960 Hours
Total Reporting:		1560 Hours
<i>Disclosure (biennial testing)</i>	5	400 Hours
<i>Disclosure (annual testing)</i>	4	640 Hours
Total Disclosure:		1040 Hours
<i>Total Responses</i>	27 Responses	
<i>Total Burden Hours:</i>	6,760 Hours	

Cost of Hour Burden

6,760 hours x \$131.10 = \$886,236.00

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:

+520 hours

Current burden: 6,240

Revised burden: 6,760

Difference: 520

The increase in burden is due to the addition of one biennial respondent.

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 the certification statement in Item 19 of OMB Form 83-I:

None.

B. Collections of Information Employing Statistical Methods.

Not applicable.