

**Supporting Statement for
Disclosure of Financial and Other Information by National Banks
12 CFR Part 18
OMB Control No. 1557-0182**

A. Justification.

1. *Circumstances that make the collection necessary:*

The OCC, as the primary regulator for national banks, is responsible for fostering the safety and soundness of the Federal banking system. This program of periodic financial disclosure is necessary, not only to facilitate informed decision making by existing and potential customers and investors, but also to improve public understanding of, and confidence in, the financial condition of individual national banks and the national banking system. Financial disclosure also reduces the likelihood that the market will overreact to incomplete information. Disclosure of financial information complements the OCC's supervisory efforts.

2. *Use of the information:*

Depositors, security holders, and the general public use the information to evaluate the condition of, and decide whether to do business with, a particular bank. Disclosure and increased public knowledge also complement the OCC's efforts to promote the safety and soundness of national banks and the national banking system.

3. *Consideration of the use of improved information technology:*

National banks may adopt any existing technology relevant to producing or delivering the information.

4. *Efforts to identify duplication:*

The information collected under part 18 is also collected through the Consolidated Reports of Condition and Income. Therefore, the OCC has proposed to remove part 18 in its entirety, 81 FR 13607 (March 14, 2016). Following issuance of a final rule removing part 18, the OCC will discontinue this information collection.

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

This collection of information imposes on national banks, regardless of size, only the minimum burden necessary to accomplish the program objectives discussed in Items 1 and 2. The OCC has minimized the program burden for all national banks by making the narrative

portion of the disclosure optional.

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

The information collection has been identified as duplicative of the Consolidated Reports of Condition and Income and will be discontinued.

7. *Special circumstances necessitating collection inconsistent with 5 CFR part 1320:*

Not applicable.

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

On February 25, 2016, the OCC issued a notice for 60 days of comment concerning the collection, 81 FR 9584. The OCC received one comment from an individual.

The commenter questioned the utility and benefit of the information collection compared to the burden because the rule requires information that is already available through OCC's program of periodic and financial disclosure and other sources. The commenter suggested that the rule should be replaced with easy to understand measures or statistics or rewritten to minimize the burden and enhance the quality and clarity of the information collected. The information collected under part 18 is also collected through the Consolidated Reports of Condition and Income. Therefore, the OCC has proposed to remove part 18 in its entirety, 81 FR 13607 (March 14, 2016). Following issuance of a final rule removing part 18, the OCC will discontinue this information collection.

The commenter stated that the OCC improves the quality, utility, and clarity of information when it attentively responds to all significant public comments before finalizing rules. The commenter also believes that when the OCC leaves unclear whether it considered comments, the public record is incomplete and the OCC creates the perception that it makes final decisions on rules without considering the data, views, and arguments of others. The OCC carefully considers all comments.

9. *Payment to respondents:*

None.

10. *Any assurance of confidentiality:*

No assurance of confidentiality is made.

11. *Justification for questions of a sensitive nature:*

There are no questions of a sensitive nature.

12. Burden estimate:

The regulation applies to approximately 1,061 national banks and 49 Federal branches and agencies. Most banks will use their Call Reports or information prepared for annual reports as their disclosure material.

1,110 respondents @ 1 response = 1,110 responses
1,110 responses @ .5 burden hours = 555 burden hours

Cost of Hour Burden:
555 x \$101 = \$56,055

To estimate average hourly wages we reviewed data from May 2015 for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for depository credit intermediation (NAICS 522100). To estimate compensation costs associated with the rule, we use \$101 per hour, which is based on the average of the 90th percentile for seven occupations adjusted for inflation (2 percent), plus an additional 30 percent to cover private sector benefits. Thirty percent represents the average private sector costs of employee benefits.

13. Estimates of annualized costs to respondents:

Not applicable.

14. Estimate of annualized costs to the government:

Not applicable.

15. Change in burden:

Former: 1,338 respondents @ 1 response = 1,338 responses
1,338 responses @ .5 burden hours = 669 burden hours

New: 1,110 respondents @ 1 response = 1,110 responses
1,110 responses @ .5 burden hours = 555 burden hours

Difference: -228 respondents, -228 responses, -114 burden hours

The decrease in burden is due to the decrease in the number of national banks.

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

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

17. *Display of expiration date:*

Not applicable.

18. *Exceptions to certification statement:*

None.

B. *Collections of Information Employing Statistical Methods.*

Not applicable.