

SUPPORTING STATEMENT
MANAGEMENT OFFICIAL INTERLOCKS
(OMB No. 3064-0118)

INTRODUCTION

The Federal Deposit Insurance Corporation (FDIC) is requesting a three-year renewal of the Management Official Interlocks (OMB No. 3064-0118). The current clearance for the collection expires on July 31, 2017. There is no change in the method or substance of the collection. However, while the number of reporting institutions has decreased, there has been an adjustment in the estimated hours per response due to the increased complexity of the reporting institutions.

A. JUSTIFICATION

1. Circumstances and Need

This collection is associated with the FDIC's Management Official Interlocks regulation, 12 CFR 348, which implements the Depository Institutions Management Interlocks Act (DIMIA), 12 U.S.C. 3201-3208. DIMIA generally prohibits bank management officials from serving simultaneously with two unaffiliated depository institutions or their holding companies but allows the FDIC to grant exemptions in appropriate circumstances. Consistent with DIMIA, the FDIC's Management Official Interlocks regulation has an application requirement at section 348.6 requiring information specified in the FDIC's procedural regulation, 12 CFR 303.250. The rule also contains a notification requirement at section 348.4(i).

2. Use of the Information Collected

The information is used to provide state and federal examiners of depository institutions with documentation which will allow them to ascertain whether depository organizations are eligible for a management interlock exemption.

3. Use of Technology to Reduce Burden

Currently, the low number of respondents for this collection does not make conversion to electronic submission cost beneficial.

4. Effort to Identify Duplication

There is no duplication. Each situation is unique.

5. Minimizing the Burden on Small Entities

There is a small market share exemption under which qualified banks need not submit information that would otherwise be required. Note: The FDIC implemented an increase in the small bank exemption, from \$20 million to \$50 million, pursuant to a statutory mandate (the Financial Services Regulatory Relief Act of 2006). Because more banks are covered by this exemption as a result of the change, the effect is to reduce burden overall. However, because banks must submit an application to be considered exempt, there may be an increase in the number of respondents for this collection, with a concomitant upward adjustment in burden, as more small banks may take advantage of the increased threshold for the exemption.

6. Consequence of Less Frequent Collections

This occasional collection is the minimum required to implement the statute.

7. Special Circumstances

None.

8. Consultation with Persons Outside the FDIC

A notice seeking public comment for a 60-day period was published in the *Federal Register* on April 28, 2017 (82 FR 19718). No comments were received.

9. Payment or Gift to Respondents

None.

10. Confidentiality

The Freedom of Information Act will govern the confidentiality accorded to the information in the collection.

11. Information of a Sensitive Nature

This requirement contains no sensitive information.

12. Estimates of Hour Burden and Annualized Cost

Number of Respondents: 3
 Number of Responses per Respondent: 1
 Total Number of Responses: 3
 Hours per Response: 7
 Total Burden Hours: 21 hours

Cost: 21 hours X \$30.64 per hour¹ = \$643.44

2017 Summary of Annual Burden and Internal Cost (3064-0118)						
	Type of Burden	Estimated Number of Respondents	Estimated Number of Responses	Estimated Time per Response	Frequency of Response	Total Annual Estimated Burden
Management Official Interlocks	Reporting	3	1	7	On Occasion	21 hours
TOTAL HOURLY BURDEN						21 hours
TOTAL INTERNAL COST	\$30.64	/HR				\$643.44

13. Capital, Start-Up and Maintenance Costs

None.

14. Estimated Annual Cost to the Federal Government

None.

15. Reason for Change in Burden

There is no change in the method or substance of the collection. The 19 reduction in burden hours is a result of economic fluctuation as well as the change in complexity of the reporting institutions. The number of respondents has decreased while the hours per response have increased due to the complexity of the reporting institutions.

¹ Total annual burden cost estimate is based on hourly compensation estimates for Office and Administrative Support Occupations (\$30.64). The estimates include May 2015 75th percentile hourly wage rate reported by the BLS (\$19.36), National Industry-Specific Occupational Employment and Wage Estimates. The reported hourly wage rates are adjusted for changes in the CPI-U between May 2015 and December 2016 (2.5 percent) and grossed up by 154.3 percent to account for non-monetary compensation as reported by the December 2016 Employer Costs for Employee Compensation Data.

16. Publication

The information is not published.

17. Display of Expiration Date

Not applicable.

18. Exceptions to Certification

None.

B. STATISTICAL METHODS

Not applicable.