

Supporting Statement
OCC Supplier Registration Form
OMB Control No. 1557-0316

A. Justification.

1. *Circumstances that make the collection necessary:*

Section 342 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank) required the Office of the Comptroller of the Currency (OCC) to:

Develop and implement standards and procedures to ensure, to the maximum extent possible, the fair inclusion and utilization of minorities, women, and minority-owned, and women-owned businesses in all business and activities of the agency at all levels, including in procurement, insurance, and all types of contracts.
12 U.S.C. 5452(c)(1).

Dodd-Frank also required the OCC to develop standards for “coordinating technical assistance to such businesses.” 12 U.S.C. 5452(b)(2)(B).

In order to comply with the Congressional mandates to develop standards for the fair inclusion and utilization of minority- and women-owned businesses and to provide effective technical assistance to these businesses, the OCC developed a system to collect on an ongoing basis up-to-date contact information and capabilities statements from potential suppliers. The OCC uses this information to update and enhance its internal database of interested minority- and women-owned businesses. This information also allows the OCC to measure the effectiveness of its technical assistance and outreach efforts and to target areas where additional outreach efforts are necessary.

Moreover, in collaboration with the U.S. Department of the Treasury and U.S. Small Business Administration (SBA), the OCC establishes annual small business contracting goals. The Federal Acquisitions Regulations (FAR) at 48 CFR 19.202-2 require agencies to locate small business sources by making every reasonable effort, before issuing solicitations, to identify small businesses to be included on the solicitation list.

The collection allows the OCC to bolster its internal database of interested small businesses, small disadvantaged businesses (SDBs),¹ women-owned small businesses, service disabled veteran-owned small businesses and Historically Underutilized Business (HUB) Zone small businesses in order to comply with this FAR requirement and maximize opportunities for the OCC to meet and exceed its annual SBA goals. This collection helps ensure the maximum participation of small business concerns in the OCC’s procurement process.

¹ An SDB is a small business that is at least 51 percent owned by one or more individuals who are both socially and economically disadvantaged. The term “socially disadvantaged” may include members of the following designated groups: Asian Americans, Black Americans, Hispanic Americans, Native Americans, and members of other groups designated by the SBA (see 12 CFR 124.103).

2. Use of the information:

This collection requires supplier information to be submitted to the agency once through an electronic supplier registration website and updated by the business as information changes or new information develops.

The OCC uses the information to conduct outreach and provide technical assistance to minority- and women-owned businesses. The information also is used to determine whether there are businesses with capabilities in certain socioeconomic categories in order to assess whether set-asides pursuant to FAR Part 19 are appropriate.

3. Consideration of the use of improved information technology:

This collection involves the use of automated, electronic, or other technological collection techniques. The process is available on the OCC's public website, www.occ.gov/omwi, to facilitate its access by the entire business community. Suppliers have the ability to complete the form online and submit it to the OCC electronically.

This electronic format significantly reduces the burden associated with manual filing and submission of the form, which would take significantly longer to process. The electronic form also makes it easier for suppliers to update their contact information and make other changes in the information they provide initially.

4. Efforts to Identify Duplication:

Although information is available in the System for Award Management (SAM), the Federal government's registry for federal contractors, the OCC's collection of information from interested suppliers enables the agency to target minority-owned and women-owned suppliers and gauge its outreach efforts. The collection also allows businesses to provide specific information to the OCC on capabilities that meet the OCC's needs and purchasing areas.

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

The OCC minimized the impact of the Supplier Registration Form by administering it via a web-based method. This method allows businesses easy access and the ability to cut and paste their capability statements. In addition, the completion of the supplier registration is voluntary and businesses only need to provide any information they want to include.

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

Without the implementation and use of the business registration, the OCC would not be able to capture the technical assistance information that Congress is requiring pursuant to Dodd-Frank.

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

Not applicable.

8. Efforts to consult with persons outside the agency:

On April 5, 2019, the OCC published a notice for 60 days of comment concerning this collection, 84 FR 13785. No comments were received.

9. Payment or gift to respondents:

There is no payment/gift to respondents.

10. Assurance of confidentiality:

A privacy impact assessment has been prepared concerning this collection and is included in the Information Collection Request (ICR) as a supplemental document.

11. Justification for questions of a sensitive nature:

There are no questions of a sensitive nature.

12. Burden estimate:

The OCC projects that approximately 200 suppliers each year will submit this voluntary supplier registration form. The time estimated to complete the form is approximately 10 minutes. Because the information that is requested is general and readily available to the supplier/respondent, the hour burden should be the same and consistent across the vast majority of the suppliers.

Estimated Number of Respondents: 200.

Estimated Burden per Respondent: 10 minutes.

Total Estimated Burden: 33.33 hours (Automatically rounded to 33 hours by ROCIS).

Assuming an individual's annual income of \$42,000 (approximate per capita income in the U.S) and total labor of 2,000 hours per year, the hourly rate would be \$21. A ten-minute session to complete the form constitutes 1/6 of an hour. As such, the cost per individual to complete the form would be approximately \$3.50. Assuming 200 suppliers complete and submit this form, the total cost would be \$700. This cost is a "start-up" cost, because the form will be

submitted just once. There are no significant subsequent costs associated with this supplier registration form. This request for approval covers only one one-page form.

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

None.

14. *Estimate of annualized cost to the Federal government:*

There is no annualized cost to the Federal Government in collecting this supplier-registration form information. The Supplier-Registration Form consists of a static set of information that does not require a review process. Upon submission, supplier information flows automatically to a supplier database. The collection of this information, using the automated online form, does not cause the agency to incur an additional expense.

15. *Change in burden:*

There is no change in burden.

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

There are no plans for publication of individual supplier results.

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

Not applicable.

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

There are no exceptions to the certification.

B. Collections of Information Employing Statistical Methods.

Not applicable.