

**Supporting Statement for the  
Recordkeeping Provisions Associated with Stress Testing Guidance  
(FR 4202; OMB No. 7100-0348)**

**Summary**

The Board of Governors of the Federal Reserve System (Board), under delegated authority from the Office of Management and Budget (OMB), proposes to extend for three years, without revision,<sup>1</sup> the Recordkeeping Provisions Associated with Stress Testing Guidance (Stress Testing Guidance) (FR 4202; OMB No. 7100-0348).<sup>2</sup> The Stress Testing Guidance was issued jointly by the Board, the Federal Deposit Insurance Corporation, and the Office of the Comptroller of the Currency (the agencies). The agencies published a notice for comment on June 15, 2011. The interagency guidance outlines high-level principles for stress testing practices applicable to all Board-supervised banking organizations with more than \$10 billion in total consolidated assets.<sup>3</sup>

The estimated total annual burden for the FR 4202 is 18,000 hours.

**Background and Justification**

All banking organizations should have the capacity to understand their risks and the potential impact of stressful events and circumstances on their financial condition. The U.S. federal banking agencies have previously highlighted the use of stress testing as a means to better understand the range of banking organizations' potential risk exposures. The financial crisis that occurred between 2007 and 2009 further underscored the need for banking organizations to incorporate stress testing into their risk management, as banking organizations unprepared for stressful events and circumstances can suffer acute threats to their financial condition and viability.

On May 17, 2012, the agencies jointly published the Stress Testing Guidance in the *Federal Register*.<sup>4</sup> The Stress Testing Guidance outlines high-level principles for firms' stress testing practices and highlights the importance of stress testing as an ongoing risk management practice that supports a banking organization's forward-looking assessment of its risks.

The guidance is consistent with industry practices and with international supervisory standards.<sup>5</sup> The guidance does not explicitly address the stress testing requirements imposed

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<sup>1</sup> Although FR 4202 may be revised in the near future due to provisions of Economic Growth, Regulatory Relief, and Consumer Protection Act (EGRRCPA) affecting stress testing, the extension of the information collection for three years is necessary to ensure that institutions comply with the current provisions. Given ongoing discussions by the Board relating to the EGRRCPA and efforts to implement it, there could be changes to the Board's regulations and/or guidance in this area that could have an impact on the FR 4202 in the future.

<sup>2</sup> There is no formal reporting form for this collection of information (the FR 4202 designation is for internal purposes only).

<sup>3</sup> Board-supervised banking organizations include state member banks, bank holding companies, and all other institutions for which the Board is the primary federal supervisor.

<sup>4</sup> 77 FR 29458.

<sup>5</sup> See "Principles for Sound Stress Testing Practices and Supervision," Basel Committee on Banking Supervision,

upon certain companies by section 165(i) of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (Dodd-Frank Act). On October 9, 2012, the Board published final rules to implement the stress testing requirements contained in section 165(i) of the Dodd-Frank Act.<sup>6</sup> The provisions in those final rules are consistent with the principles in the guidance.

### **Description of Information Collection**

The Stress Testing Guidance recommends that banking organizations (1) have a stress testing framework that includes clearly defined objectives, well-designed scenarios tailored to the banking organization's business and risks, well-documented assumptions, conceptually sound methodologies to assess potential impact on the banking organization's financial condition, informative management reports, and recommended actions based on stress test results; and (2) have policies and procedures for a stress testing framework. These recordkeeping activities are collections of information under the PRA.

An organization should have written policies, approved and annually reviewed by the board, that direct and govern the implementation of the stress testing framework in a comprehensive manner. Policies, along with procedures to implement them, should

- describe the overall purpose of stress testing activities;
- articulate consistent and sufficiently rigorous stress testing practices across the entire organization;
- indicate stress testing roles and responsibilities, including controls over external resources used for any part of stress testing (such as vendors and data providers);
- describe the frequency and priority with which stress testing activities should be conducted;
- indicate how stress test results are used and by whom, and
- be reviewed and updated as necessary to ensure that stress testing practices remain appropriate and keep up to date with changes in market conditions, organization products and strategies, organization exposures and activities, the organization's established risk appetite, and industry stress testing practices.

### **Respondent Panel**

The FR 4202 panel comprises all Board-supervised banking organizations with more than \$10 billion in total consolidated assets.

### **Time Schedule for Information Collection**

The documentation associated with the activities described in the Stress Testing Guidance is maintained by each institution and may be reviewed by Federal Reserve System examiners.

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May 2009.

<sup>6</sup> Annual Company-Run Stress Test Requirements for Banking Organizations With Total Consolidated Assets Over \$10 Billion Other Than Covered Companies, 77 FR 198 (October 12, 2012); and Supervisory and Company-Run Stress Test Requirements for Covered Companies, 77 FR 198 (October 12, 2012).

## **Public Availability of Data**

There is no data related to this information collection available to the public.

## **Legal Status**

Legal authorization and confidentiality: This voluntary information collection is authorized pursuant to section 11 of the Federal Reserve Act, 12 U.S.C. 248 (state member banks); sections 25 and 25A of the Federal Reserve Act, 12 U.S.C. 602 and 625 (Edge and Agreement corporations); section 5 of the Bank Holding Company Act of 1956, 12 U.S.C. 1844 (bank holding companies) and, in conjunction with section 8 of the International Banking Act, 12 U.S.C. 3106 (foreign banking organizations); section 7(c) of the International Banking Act of 1978, 12 U.S.C. 3105(c) (branches and agencies of foreign banks); section 10 of the Home Owners' Loan Act, 12 U.S.C. 1467a, (savings and loan holding companies), and section 165(i) of the Dodd-Frank Wall Street Reform and Consumer Protection Act, 12 U.S.C. 5365 (nonbank financial companies supervised by the Board).

Because the collections of information associated with the FR 4202 do not involve the submission of information to the Board, no issues of confidentiality would normally arise. To the extent that the Board collects such information during an examination of the banking organization, confidential treatment may be afforded to that information under exemption 8 of the Freedom of Information Act (FOIA) (5 U.S.C. 552(b)(8)), which protects information collected as part of the Board's supervisory process. Additionally, individual respondents may request confidential treatment of information pursuant to exemption 4 of the FOIA (5 U.S.C. 552(b)(4)), which protects "trade secrets and commercial or financial information obtained from a person [that is] privileged or confidential." The Board will treat such information as confidential to the extent permitted by law, including the FOIA.

## **Consultation Outside the Agency**

The Board has consulted with the agencies and confirmed that there will be no revisions to the guidance, and no revision to the time per response estimates. Each agency may update their respective respondent counts if needed.

## **Public Comments**

On March 8, 2021, the Board published an initial notice in the *Federal Register* (86 FR 13378) requesting public comment for 60 days on the extension, without revision, of the FR 4202. The comment period for this notice will expire on May 7, 2021.

## **Estimate of Respondent Burden**

As shown in the table below, the estimated total annual burden for the FR 4202 is 18,000 hours. The Board estimates that it takes the approximately 100 Board-supervised institutions with more than \$10 billion in total consolidated assets 180 hours to comply with the

recordkeeping requirements, including 40 hours to document the assumptions used in its stress tests and note the degree of uncertainty that may be incorporated into the tools used for stress testing, 40 hours to maintain a summary of test results, 80 hours for the initial creation of the policies and procedures, and 20 hours for training. These recordkeeping requirements represent less than 1 percent of total Federal Reserve System paperwork burden.

<b>FR 4202</b>	<i>Number of respondents<sup>7</sup></i>	<i>Annual frequency</i>	<i>Estimated average hours per response</i>	<i>Estimated annual burden hours</i>
Recordkeeping	100	1	180	18,000
	<i>Total</i>			18,000

The current annual cost to the public of these reports is estimated to be \$1,039,500.<sup>8</sup>

### **Sensitive Questions**

This information collection contains no questions of a sensitive nature, as defined by OMB guidelines.

### **Estimate of Cost to the Federal Reserve System**

Since the FR 4202 does not require the Federal Reserve to collect any information, the cost to the Federal Reserve System is negligible.

<sup>7</sup> Of these respondents, none are considered small entities as defined by the Small Business Administration (i.e., entities with less than \$600 million in total assets), <https://www.sba.gov/document/support--table-size-standards>.

<sup>8</sup> Total cost to the public was estimated using the following formula: percent of staff time, multiplied by annual burden hours, multiplied by hourly rates (30% Office & Administrative Support at \$20, 45% Financial Managers at \$71, 15% Lawyers at \$70, and 10% Chief Executives at \$93). Hourly rates for each occupational group are the (rounded) mean hourly wages from the Bureau of Labor and Statistics (BLS), Occupational Employment and Wages May 2019, published March 31, 2020 [www.bls.gov/news.release/ocwage.t01.htm](http://www.bls.gov/news.release/ocwage.t01.htm). Occupations are defined using the BLS Occupational Classification System, [www.bls.gov/soc/](http://www.bls.gov/soc/).