

**Supporting Statement for the
Consumer Satisfaction Questionnaire,
Federal Reserve Consumer Help – Consumer Survey,
Consumer Online Complaint Form, and Appraisal Complaint Form
(FR 1379a, b, c, and d; OMB No. 7100-0135)**

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, the Consumer Satisfaction Questionnaire (FR 1379a), the Federal Reserve Consumer Help– Consumer Survey (FR 1379b), the Consumer Online Complaint Form (FR 1379c), and the Appraisal Complaint Form (FR 1379d, and collectively, FR 1379; OMB No. 7100-0135).

- The FR 1379a is sent to consumers who have filed complaints with the Federal Reserve against state member banks or other financial institution supervised by the Federal Reserve. The information is used to assess the satisfaction of the consumers with the Federal Reserve’s handling of, and written response to, their complaints at the conclusion of an investigation.
- The FR 1379b is a survey sent to consumers who contact the Federal Reserve Consumer Help [desk] (FRCH)¹ to file a complaint or inquiry. The information is used to determine whether consumers are satisfied with the way the FRCH handled their complaint.
- The FR 1379c collection addresses the burden associated with consumers electronically submitting a complaint against a financial institution to the FRCH.
- The FR 1379d collects information about complaints regarding a regulated institution’s non-compliance with the appraisal independence standards and the Uniform Standards of Professional Appraisal Practice, including complaints from appraisers, individuals, financial institutions, and other entities.

The Board estimates the total annual burden for the FR 1379 information collection to be 1,291 hours.

Background and Justification

A 1976 staff report by the Subcommittee on Consumer Affairs of the House Committee on Banking, Currency and Housing recommended the periodic evaluation of the Federal Reserve’s complaint-handling system. In response, the Board developed the Consumer Satisfaction Questionnaire in May 1977 to be sent to consumers whose complaints against state member banks were referred to a Federal Reserve Bank for investigation. Completion of the questionnaire is voluntary. In 1999, the Board extended distribution of the questionnaire to all consumers who have filed complaints involving state member banks and began requesting that consumers provide certain demographic information. The questionnaire has been revised from time to time, most recently in 2008, to assess consumer attitudes more accurately.

¹ See www.federalreserveconsumerhelp.gov/.

In November 2017, the Federal Reserve System launched the FRCH website, www.federalreserveconsumerhelp.gov, a new centralized resource that consolidates and streamlines the Federal Reserve System's intake of consumer complaints and inquiries. The FRCH is operated by existing call centers and staff at the Kansas City and Minneapolis Reserve Banks. As a result, in 2008, the Board implemented (1) a new voluntary survey, the FRCH – Consumer Survey, to facilitate assessment of FRCH staff's handling of consumer complaints and inquiries, and (2) a new voluntary online consumer complaint form, the Consumer Online Complaint Form, available on the FRCH website. .

In 2012, the appraisal complaint form was created to assist in efforts to oversee the appraisal practices of Board-supervised institutions. Appraisal complaints are submitted to the appropriate agency using the Interagency Appraisal Complaint Form and are filed directly by an appraiser, other individual, financial institution, or other entities.

Description of Information Collection

Consumer Satisfaction Questionnaire

The Consumer Satisfaction Questionnaire is a six-question questionnaire that is sent to a consumer after investigation of the consumer's complaint against a state member bank. Although participation is optional, the questionnaire indicates that the responses would help improve the Federal Reserve's service to consumers.

The Consumer Satisfaction Questionnaire includes four questions that ask consumers to indicate their level of satisfaction with the Federal Reserve's investigation. The fifth question asks consumers to indicate how they learned about the Federal Reserve's consumer complaint program, and the sixth question asks whether they would contact the Federal Reserve again for assistance.

FRCH - Consumer Survey

The FRCH - Consumer Survey is a five-question survey sent to consumers who contacted the FRCH to file a complaint or inquiry.

Consumer Online Complaint Form

The Consumer Online Complaint Form is an online, fillable complaint form. Consumers can electronically complete and submit the complaint form on the FRCH website thereby increasing the speed with which consumers can transmit their complaint and receive a response from FRCH staff.

Alternatively, consumers may download a PDF version of the complaint form from the FRCH website² and e-mail, mail via the US Postal Service, or fax it to the FRCH. The

² The form is available online at <https://forms.federalreserveconsumerhelp.gov/secure/complaint/formComplaint>. A print version of FR 1379c is available at https://federalreserveconsumerhelp.gov/~/_media/Files/complaint/complaintform.pdf.

complaint form asks consumers for their contact information, information about the institution they are filing a complaint against, a description of the complaint, and how it can be satisfactorily addressed.

Appraisal Complaint Form

The Appraisal Complaint Form is an online, fillable complaint form.³ Alternatively, consumers may download a PDF version of the complaint form from the FRCH website⁴ and e-mail, mail via the US Postal Service, or fax it to the FRCH.

Time Schedule for Information Collection and Publication

There are no established time schedules for completing the consumer satisfaction questionnaire, consumer survey, online complaint form, or appraisal complaint form because their use by consumers is voluntary. These collections are event generated, and submission is voluntary.

The data collected on the 1379 family of forms may be aggregated and published in the Board's annual report to Congress and other internal reports.

Legal Status

The FR 1379 family of forms is authorized pursuant to section 8 of the Federal Deposit Insurance Act (Section 8)⁵ and section 11(a) of the Federal Reserve Act (Section 11(a)).⁶ Section 8 provides the Board broad authority to enforce compliance with laws against entities within its jurisdiction, including state member banks. Section 11(a) broadly empowers the Board to examine “the affairs of each Federal reserve bank and of each member bank.”⁷ The Board uses the information obtained from the FR 1379 to help fulfill these obligations.

The forms comprising the FR 1379 family of forms are voluntary. Individual respondents may request that information submitted to the Board through the FR 1379 family of forms be kept confidential on a case-by-case basis. The Consumer Satisfaction Questionnaire (FR 1379a) does not collect any personal information from the respondent and is not likely to be considered confidential. Three of the forms (the FRCH– Consumer Survey (FR 1379b), Consumer Online Complaint Form (FR 1379c), and Appraisal Complaint Form (FR 1379d)) collect personal information, such as the respondent's name, contact information, and information regarding the subject of the complaint. This personal information may be kept confidential under exemption 6 of FOIA because disclosure of such information would constitute

³ The form is available at <https://forms.federalreserveconsumerhelp.gov/secure/appraisal/formAppraisalIntro>.

⁴ A print version of FR 1379c is available at <https://federalreserveconsumerhelp.gov/~media/Files/complaint/complaintform.pdf>.

⁵ 12 U.S.C. 1818.

⁶ 12 U.S.C. 248(a).

⁷ The FR 1379d is additionally authorized pursuant to Title XI of the Financial Institutions Reform, Recovery, and Enforcement Act of 1989, which requires the Board to prescribe standards for appraisals used by its regulated entities. See, 12 U.S.C. 3331-3355.

an unwarranted invasion of personal privacy.⁸ In addition, information concerning the subject of a complaint may be kept confidential under exemption 4 of FOIA to the extent it involves trade secrets and confidential commercial and financial information.⁹ With respect to the Consumer Online Complaint Form (FR 1379c) and Appraisal Complaint Form (FR 1379d), determinations regarding disclosure of the information to third parties of any confidential portions of these forms would be made in accordance with the Privacy Act.¹⁰ A hyperlink directing the applicant to the relevant Privacy Act statement will be provided in these forms on the Board’s website.

Consultation Outside the Agency

There has been no consultation outside the Federal Reserve System.

Public Comments

On September 10, 2019, the Board published an initial notice in the Federal Register (84 FR 47507) requesting public comment for 60 days on the extension, without revision, of the FR 3067. The comment period for this notice will expire on November 12, 2019.

Estimate of Respondent Burden

As shown in the table below, the current total annual reporting burden for the FR 1379 is estimated to be 1,291 hours based upon 8,732 consumer responses. These reporting requirements represent less than 1 percent of total Federal Reserve System paperwork burden.

FR 1379	<i>Number of respondents</i>	<i>Annual frequency</i>	<i>Estimated average time per response</i>	<i>Estimated annual burden hours</i>
FR 1379a	551	1	5 minutes	46
FR 1379b	1,455	1	5 minutes	121
FR 1379c	6,719	1	10 minutes	1,120
FR 1379d	7	1	30 minutes	<u>4</u>
<i>Total</i>				1,291

The estimated total annual cost to the public for these collections of information is \$33,566.¹¹

Sensitive Questions

These collections of information contain no questions of a sensitive nature, as defined by OMB guidelines.

⁸ 5 U.S.C. 552(b)(6).

⁹ 5 U.S.C. 552(b)(4).

¹⁰ 5 U.S.C. 552a(b).

¹¹ The average consumer cost of \$26 per hour is estimated using data from the BLS Economic News Release (USDLE-16-0462) www.bls.gov/news.release/cewqtr.nr0.htm.

Estimate of Cost to the Federal Reserve System

The total annual cost to the Federal Reserve System is minimal for printing, distributing, and processing. Only the Consumer Satisfaction Survey is administered by mail; the FRCH – Consumer Survey and the Consumer Online Complaint Form are administered electronically.