

**From:** [Jennifer Johnson](#)  
**To:** [PRAINFO](#)  
**Subject:** Bank Secrecy Act/Money Laundering Risk Assessment Information Collection  
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Good morning,

I would like to comment on information collection through the Money Laundering Risk (MLR) System. This is the first year I have worked for a national bank, so I was not familiar with the MLR system until recently. I was surprised at the amount of work it took to put this report together. Here are my specific comments:

- (a) Whether the collection of information is necessary for the proper performance of the functions of the agency, including whether the information has practical utility;  
I don't feel I can speak to whether collection of this information is necessary for the proper performance of the OCC (that is up to the OCC to decide); however, this information was not required by the regulatory agency that governed the bank I used to work at. I do also feel that this information is redundant, as we are already completing a BSA Risk Assessment annually as part of our normal risk management procedures. The reporting in the MLR System does nothing to help us further identify our risk.
- (b) The accuracy of the agency's estimate of the burden of the collection of information;  
I do not feel the estimate of the burden of collection of information is accurate for community banks. If the Estimated Number of Responses is 1,450, and the Estimated Annual Burden is 8,700 hours, that would equal approximately six hours of work per respondent. I work at a small institution (less than 200 million in assets; 50 employees), and I would estimate that it took me at least 40 hours (if not more) to collect all the information needed to complete the form.
- (c) Ways to enhance the quality, utility, and clarity of the information to be collected;  
I think the quality of the information has already been improved by requiring total amounts, rather than averages.
- (d) Ways to minimize the burden of the collection on respondents, including through the use of automated collection techniques or other forms of information technology; and  
Automated collection would be helpful; however I am not sure how to implement that without violating customer privacy.
- (e) Estimates of capital or start-up costs and costs of operation, maintenance, and purchase of services to provide information.  
While I'm sure there are additional kinds of software that would make collection of this information easier, the costs of that software outweigh the benefits of the time saved in a small institution such as mine. We are more likely to invest in software that helps us streamline other reporting requirements, such as HDMA.

Thank you for your time. Please contact me if you have any additional questions.

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