

## Supporting Statement A

### U.S. Election Assistance Commission

#### Study of the Feasibility and Advisability of Establishing a Program of Free Return or Reduced Postage for Absentee Ballots

#### Focus Groups

#### A. JUSTIFICATION

##### 1. Explain the circumstances that make the collection of information necessary.

Section 246 of the Help America Vote Act (HAVA) of 2002 (42 U.S.C. 15301) mandates that the U.S. Election Assistance Commission (EAC), in consultation with the United States Postal Service, to conduct a study on the feasibility and advisability of establishing a program under which the U.S. Postal Service shall waive or otherwise reduce the amount of postage applicable with respect to absentee ballots returned by voters in general elections for Federal office. This study does not address the cost to the U.S. Postal Service for free postage for sending absentee ballots but may consider costs to election officials that are related to implementing such a program including the costs of sending absentee ballots to voters. It also does not include consideration of the 39 USC 3406 provisions for the mailing of balloting materials for military and overseas absentee voters. As part of the study the Commission is directed to conduct a survey of potential beneficiaries, including the elderly and disabled, and to take into account the results of this survey in determining the feasibility and advisability of establishing such a program. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office.

##### 2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

HAVA §246 mandates the EAC conduct a one-time information collection regarding the feasibility and advisability of establishing a program under which the U.S. Postal Service shall waive or otherwise reduce the amount of postage applicable with respect to absentee ballots returned by voters in general elections for Federal office. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such

program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office.

The information for this collection will be collected through a one-time public opinion survey of 1,200 randomly selected U.S. citizens throughout the fifty U.S. States and through nine focus groups meetings designed to explore, in-depth, issues concerning the potential beneficiaries of this program. The beneficiaries include those who will be more likely to participate in federal elections should this program be implemented, including the elderly, the disabled, and the impoverished. This Information Collection Request (ICR) is only for the focus groups, the national voter survey is being submitted as a separate ICR for review and clearance in accordance with the Paperwork Reduction Act of 1995.

The focus groups to be carried under this proposed information collection will be divided as follows: three (3) focus groups will be dedicated to issues confronting the elderly population; three (3) focus groups will be dedicated to issues confronting the disabled population; and three (3) focus groups will be dedicated to issues confronting the impoverished. Locations of the focus groups have been determined through consultation with the U.S. Postal Service and the study contractor, see Figure 1 below.

Figure 1

	Low-income	Senior Citizens	Individuals with Disabilities
Urban	Washington, DC	Sacramento, California	Washington, DC
Rural	Lenawee/Hillsdale County Michigan	Lafayette County, Mississippi	Central Valley, California
Suburban	Memphis, Tennessee Metro (Marshall County, Mississippi)	Colorado Springs, Colorado	Detroit area Michigan

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

Not applicable to this collection.

**4. Describe efforts to identify duplication.**

This information collection is mandated by HAVA §246. Previous and contemporaneous public opinion surveys on the subject matter have been reviewed to eliminate duplication.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

This collection of information will seek out assistance from small entities that specialize in

working with the elderly, impoverished, and disabled in securing participants for the focus groups. The study contractor will also seek out assistance from small entities in meeting any special needs of the possible participants. The assistance provided by these small organizations will be on a voluntary basis and will have minimal economic impact.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

HAVA §246 mandates the EAC conduct this information collection. This is a one-time information collection. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office. Failure to conduct the collection of this information may result in the EAC being unable to meet its statutory requirements under HAVA (42 U.S.C. 15301). This information collection was required to be carried out no later than the date that was 1 year after the date of the enactment of HAVA (2002); as such, it is not recommended that the collection or the report due to Congress be delayed further.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

Not applicable.

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

The EAC published a notice in the Federal Register on November 14, 2006, at 71 FR 66321 soliciting comments for a period of sixty (60) days. A second notice was published on May 18, 2007, at 72 FR 28036 soliciting comments for a period of thirty (30) days.

**Public Comment Summary:**

1. This information collection request received a comment from the U.S. Postal Service citing a concern over the potential establishment of a program of free return or reduced postage for absentee ballots. The U.S. Postal Service indicated that it lacks appropriations to fund such a

program, and the positive experience of Oregon and Washington, which rely almost exclusively on a vote-by-mail system, suggests that increased voter participation is not correlated with free or reduced postage for absentee ballots. In a separate communication, the U.S. Postal Service provided suggestions to improve this information collection.

2. This information collection request received a comment from a member of the public indicating that the study will fail to draw any valid conclusions due to such a small sample of potential beneficiaries.

**Actions Taken:**

In response to these comments, the EAC and the study contractor decided to increase the number of focus groups from three to nine. Each selected group (individuals with disabilities, Senior Citizens and people with low-incomes) will have three dedicated focus groups. To ensure the diversity of responses and participants, each selected group will have one focus group from an urban, rural, and suburban location (Figure 1).

Figure 1.

	Low-income	Senior Citizens	Individuals with Disabilities
Urban	Washington, DC	Sacramento, California	Washington, DC
Rural	Lenawee/Hillsdale County Michigan	Lafayette County, Mississippi	Central Valley, California
Suburban	Memphis, Tennessee Metro (Marshall County, Mississippi)	Colorado Springs, Colorado	Detroit area Michigan

Furthermore, in consideration of the concerns presented by the U.S. Postal Service and in consultation with the EAC, the study contractor adjusted the focus group discussion guides to address these issues.

The EAC and the study contractor have consulted extensively with the U.S. Postal Service in preparing the information collection request. Wherever possible and in consultation with the EAC, the study contractor adjusted the information collection to accommodate the comments from the U.S. Postal Service. In addition, U.S. State and county election officials were consulted extensively during the development of the focus group materials.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

Respondents will be supplied a cash incentive at the rate of \$25 per participant. Providing an incentive for participation will help in the process of securing respondents for this study.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

Prior to volunteering to participate, respondents will be assured that responses will not be associated with a particular respondent.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no questions of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

The burden to each respondent is 1 hour 15 minutes. Each focus group will last no longer than 1 hour and 15 minutes. One-hundred and eight (108) respondents are required for this study. Total annual burden is estimated at 135 hours.

Due to comments received from the U.S. Postal Service and U.S. state and county election officials, the number of focus groups was increased from originally three (3) to nine (9). This has increased the Total annual burden to 135 hours.

- a. Number of respondents = 108
- b. Number of responses per each respondent = 1
- c. Total annual responses = 1
- d. Hours per response = 1.25 hours
- e. Total annual reporting burden = 135 hours (*# of respondents x frequency of response x hours of response*)

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

We have identified no reporting and recordkeeping “non-hour cost” burdens associated with this proposed collection of information.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated cost to the Federal Government is \$46,940. This estimate includes \$27,984 for personnel, \$13,243 for travel expenses, \$210 in office expenses, and \$5,593 for the focus group events.

- We estimate \$27,984 for personnel to design the study, oversee its implementation, oversee the focus groups, and draft a final report. The travel expenses for this project are estimated at \$13,243.
- We estimate \$210 for office expenses including telephone and printing costs.
- We estimate \$5,593 for the focus group events, including payment of \$25 to each participant.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.**

This is the first time this information collection has been performed by the Federal government.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office. The report will also be made available to the public on the EAC website at [www.eac.gov](http://www.eac.gov).

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not applicable to this collection.

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

To the extent that the topics apply to this collection of information, we are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”