

DRAFT

Department of the Treasury, the following Departmental Offices
Request for Emergency Processing and Approval
Request for Information on Processing Garnishment Orders

Emergency Justification

The Department of the Treasury (Treasury) respectfully requests emergency processing and approval for a collection of information requested from credit unions asking for information on how credit unions process court order garnishments. This information is necessary to finalize two important policy initiatives for which time is of the essence: one that would require Federal beneficiaries to receive their payments electronically, and another that would provide better force and effect to Federal anti-garnishment statutes.

Treasury cannot reasonably comply with the normal clearance procedures under 5 C.F.R. Part 1320 because the information is needed within the next several weeks in order to assess the current processing environment in credit unions and determine a comprehensive solution.

Department of the Treasury, Departmental Offices
Supporting Statement and Request for Clearance
Request for Information on Processing Garnishment Orders

1. Circumstances necessitating the collection of information

Treasury needs information that describes the processes that credit unions currently use to respond to court ordered garnishments.

2. Use of the data

This information is necessary to finalize two important policy initiatives for which time is of the essence: one that would require Federal beneficiaries to receive their payments electronically, and another that would better force and effect to Federal anti-garnishment statutes.

3. Use of information technology

Treasury will use an internet survey tool to create a web-based survey and will collect and administer the responses using the same tool. All of the information associated with this collection is to be submitted in electronic form.

4. Efforts to identify duplication

Treasury is not aware of any similar information already available that describes how credit unions process court ordered garnishments.

5. Impact on small entities

According to the National Credit Union Administration there are 3,454 federal credit unions with assets under \$50 million. We are asking six questions about current procedures and the volume of garnishment orders received and processed. Therefore, we do not anticipate that providing the requested information will be difficult or time consuming.

6. Consequences of less frequent collection and obstacles to burden reduction

A better understanding of credit union processes currently in place will improve Treasury's ability to understand issues related to processing court ordered garnishments by financial institutions.

7. Circumstances requiring special information collection

Not applicable.

8. Solicitation of comments on information collection

Treasury sought information and comments from financial institutions on current processing of court ordered garnishments. The information submitted by credit unions was vague and not descriptive of processes in place.

9. Provision of payments to record keepers

Not applicable.

10. Assurance of confidentiality

Any confidential information provided as part of this collection will be maintained as confidential consistent with applicable provisions of the Trade Secrets Act and Freedom of Information Act.

11. Justification of sensitive questions

Not applicable.

12. Estimated burden of information collection

The burden associated with this one-time information collection should be minimal. A credit union administrative services manager or subject matter specialist with knowledge of garnishment procedures should be able to complete the responses to the six factual questions within 30 minutes or less. Using a listing from the National Credit Union Administration of 3,457 active Federal credit unions, a systematic sample of 10% will be drawn. In this scenario the total hours needed to complete this information collection will be between approximately 173 hours.

13. Estimated total annual cost burden to respondents

The Department estimates that there will be no annualized capital/start-up costs for the respondents to collect and submit this information. This is a one-time collection of information related to credit union administrative processes and the number of court order garnishments that are received.

14. Estimated cost to the federal government.

There will be no annualized capital/start-up costs for the government to receive this information.

15. Reasons for change in burden

This is a new collection.

16. Plans for tabulation, statistical analysis and publication

For each stratum and for overall, data analysis generally will be to derive estimates of central tendency, such as the mean or median, and measures of the dispersion, such as the variance or deciles, of the questions requiring numeric responses. The study report will

estimate mean or median values for the population. There will also be a comparison of the means between strata to identify significant cases where size affects responses.

The results of this collection of information will be used by Treasury to finalize two policy initiatives. The results of the collection of information will **not** be published.

17. Reasons why displaying the OMB expiration date is inappropriate

Not applicable. An OMB control number and expiration date will be included on the collection instrument and accompanying letter/email.

18. Exceptions to certification requirement of OMB Form 83-I

Regarding this request for OMB approval, there are no exceptions to the certification statement in item 19 of Form 83-I.