

**Justification for Change of an Approved IC –Direct Express Cardholder Usage Survey
(July 16, 2010)**

The Change is to increase the number of Supplemental Security Income (SSI) cardholders to take the survey. This would also increase the number of burden hours. The justification to make this increase is as follows:

There were large percentages of cardholders removing all their money from the card, and it was mostly SSI recipients. The reason for boosting the sample size is to ensure a robust sample size and margin of error for this audience specifically. The request to conduct additional interviews is based on this new information provided by Comerica.

Originally, we requested 600 cardholders to take the survey; now, we would like for 900 cardholders to take survey (300 additional SSI cardholders). Also, we requested 150 hours of burden to complete the surveys; now, we would like to request 225 hours of burden to complete the additional surveys (75 additional hours).