

# *Supporting Statement for Paperwork Reduction Act Submission*

## **Certification Statement for the Department of Treasury**

*Revised Sept. 29, 2010*

### **A. Justification**

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

**The Department of Treasury's public-facing, Internet Website is the medium through which the Secretary and the Department communicates with business partners and the public. Currently, the public Website (www.Treasury.gov) is a static Website, its technology architecture is obsolete, and as new content has been added over time the integrity of the original content structure has been compromised. The site is minimally able to support current technologies or those desired by the President's administration, as exemplified by the White House Website. A new structure that is scalable for the changing and growing Offices, programs, initiatives and other undertakings within the Department of Treasury is essential. Equally important, Treasury is at the forefront of the current US and World economic recovery; and, Treasury.gov is a visible and essential tool kit in this effort.**

**The Department is undergoing a modernization effort to create a new, fresh, meaningful, scalable and useful Treasury.gov site that is designed for optimal constituent use. This new design will support the communications and publishing requirements of Treasury; support the strategic initiatives of Treasury; enable transparency (Open Government OMB Directive M-10-06) and increased access to Treasury resources and assets; and be user-centric and task-based.**

**This modernization effort also includes refreshing the Department's initiative sites of FinancialStability.gov and MakingHomeAffordable.gov.**

**To ensure that the revised sites deploy features that are more advanced and user-friendly, Treasury recommends that a series of usability testing and focus groups be conducted among current and intended users of the websites including the general public, businesses, academia, etc..**

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

**The Department of Treasury will use the data to develop the modernized version of the Treasury.gov, Financial Stability.gov and MakingHomeAffordable.gov websites. All findings from the focus groups and usability testing will be documented and, as appropriate, prioritized for incorporation and roll out in the overall development and design schedule.**

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

**This study is national in scope and requires national participation to ensure statistical and representative validity. Usability testing will be conducted virtually to eliminate the need for participants to travel to testing facilities, complete survey forms, etc. WebEx or similar technology will be used to conduct remote testing.**

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

**There is no duplicative information collection instrument or process.**

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

**This study requires participation from numerous audience groups interested in the Department of Treasury and its initiatives. Some participants may be small business entities who will be recruited to participate in this study. In order to minimize their burden, incentives will be issued to compensate participants for their time.**

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

**The purpose of the websites is to serve as a primary communication mechanism for the Department to communicate and provide information to the public. Design, usability and accessibility best practices have been employed in the initial development of the Treasury.gov, FinancialStability.gov and MakingHomeAffordable.gov sites. Validation through comprehensive research is imperative to a successful launch of the new websites.**

**The participants solicited for this study will only be recruited once.**

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

N/A

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe 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.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

**Due to the request for emergency clearance a copy of the Federal Register notice is not included.**

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

**An incentive of \$100 per participant will be provided upon completion of the focus groups. This amount was selected to strike the best balance between ensuring participation by members of specific professional groups, such as compliance officers, and being equitable to all participants.**

**An incentive of \$50 per participant will be provided upon completion of the usability sessions. This amount is in line with industry standards and promotes optimum show rates required to obtain validity of the information collected.**

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

**The study will not be collecting proprietary information. There is no guarantee of confidentiality, but the information will be kept private to the extent permitted by law.**

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. This justification should include the reasons why the agency considers the

questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

**There are no sensitive questions associated with this collection.**

12. Provide estimates of the hour burden of the collection of information. The statement should:

\* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices. \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.

\* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under item 13.

**Focus group participants will be asked to spend two hours in a moderated session at a third party facility. This study will recruit a total 88 focus groups participants; 11 for each of 4 focus groups for financialstability.gov and 4 groups for makinghomeaffordable.gov.**

**88 participants @ 2 hours each = 176 hours**

**Usability participants will be asked to spend one hour in a virtual moderated session. This study will recruit 44 usability testing participants.**

**44 participants @ 1 hour each = 44 hours**

**220 hours @ \$100 per participant = \$22,000**

**\$100 per participant based on professional wage**

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

\* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and

maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

\* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

\* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

**There are no annual costs associated with this collection.**

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Costs to the Federal government for contracting out or paying outside parties for information collection activities should be included here.

Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

**The total cost to the government for collecting this research is \$119,906.04. This cost includes:**

- **Moderating services**
- **Recruiting services**
- **Focus group facility rental and stationary video**
- **Incentives for participants**
- **Respondent catering**
- **Moderator travel**
- **Conference line for virtual usability testing**
- **Documentation of findings**
- **Analysis**

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

N/A

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

**Tabulation plan:**

**Findings from the focus groups and usability testing will be documented in PPT and be grouped in one of three categories:**

**No adjustments required**

- **Users were able to complete task with minimal effort**
- **Website fundamentals/attributes were appropriately used including content, functionality, navigation, layout and/or terminology**
- **High level of user satisfaction**

**Minor adjustments required**

- **Users did not immediately and instinctively complete task**
- **Website attributes at times unclear, misused or misplaced**
- **Moderate level of user satisfaction**

**Adjustments required**

- **Users questioned/expressed concern over aspects of design, functionality, navigation, layout or terminology**
- **Low level of user satisfaction**

**All documented findings will be presented to the key stakeholders per the following schedule:**

<b>Treasury.gov paper prototype testing</b>	<b>September 15, 2010</b>
<b>Treasury.gov usability testing</b>	<b>October 1, 2010</b>
<b>FinancialStability.gov focus groups</b>	<b>September 15, 2010</b>
<b>FinancialStability.gov usability testing</b>	<b>October 29, 2010</b>
<b>MakingHomeAffordable.gov focus groups</b>	<b>September 15, 2010</b>
<b>MakingHomeAffordable.gov usability testing</b>	<b>November 18, 2010</b>

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

N/A

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions,”

**There are no exceptions to item 19 of OMB Form 83-I.**