

**Justification for Nonmaterial/Non-substantive Change to
FDIC Survey of Banks' Efforts to Serve the Unbanked and Underbanked
(Branch Survey)**

This document describes the modifications to the Branch Survey instrument of the *FDIC Survey of Banks' Efforts to Serve the Unbanked and Underbanked*, last approved by OMB in October 2011. Most revisions to the Branch Survey were made to resemble the content and structure enhancements of the HQ survey, also approved by OMB in October 2011. None of the survey enhancements involved changes to the scope of inquiry, the focus of the survey, the population subject to the survey, the method of collection, the procedure for sample selection, or the estimated burden. In addition, this version of the branch survey contains a few non-material edits that were made to ensure the respondent is appropriately designated and identified.

- *Revised wording in the introduction to confirm the branch location for the respondent.* In addition to referencing the name of the headquarter bank, branch street address, branch city, and branch state are now also referenced for the respondent in the text before S1. A similar revision was made in S13 to include the branch address when referencing the branch. This is an added measure to confirm that the respondent can accurately represent the branch of interest.
- *New question S1A.* “Are you the person who will respond on behalf of this branch?” In accordance with the reply, the respondent is then asked to supply either his/her contact information or the contact information for the designated respondent. This contact information was collected in the previous instrument but was not preceded by question S1A.
- *New question S11A.* “Is location of the branch being asked about in this survey your primary work location, or do you primarily work in some other location of the bank?” The addition of this question is to gauge the respondent’s familiarity with the branch operations. A respondent whose primary work location is at the bank branch is possibly more familiar with the branch operations.
- All additional revisions to the branch survey instrument were made to resemble the content and structure enhancements of the headquarters survey approved by OMB in October 2011. These revisions are summarized below.
 - Revisions made to improve the flow of the survey include: reordering sections, removing the option to ‘save for later’, removing the ‘don’t know’ option when relevant, change the sequence of several multipart questions, and removing redundant instructions.
 - Revisions made to add clarity, included: revising definitions, adding instructions to specify the format of response (e.g., \$XX.XX), and clarifying the language of questions.

- Revisions to add flexibility for respondents and better capture answer options, included: adding answer options to existing questions, revising skip patterns, splitting questions into two.
- Revisions made to capture information about the type of bank or business model.