

**Department of the Treasury
Bureau of Engraving and Printing
Request for OMB Approval of a Generic Clearance
for Collection of Information at Conferences**

SUPPORTING STATEMENT

A. JUSTIFICATION

(1) Circumstances Necessitating the Data Collection

A court order was issued in *American Council of the Blind v. Paulson*, 591 F. Supp. 2d 1 (D.D.C. 2008), requiring the Department of the Treasury to “provide meaningful access to United States currency for blind and other visually impaired persons, which steps shall be completed, in connection with each denomination of currency, not later than the date when a redesign of that denomination is next approved by the Secretary of the Treasury” *Id.* The Department is also obligated to “file periodic status reports describing the steps taken to implement this Order and Judgment.” *Id.* Under terms of the Order, the Department must file status reports every six months until it has fully complied with the Order.

On May 31, 2011, the Secretary of the Treasury approved implementation of three accommodations; among them will be the addition of a tactile feature to Federal Reserve notes, to be “introduced in the next currency redesign”. This data collection will help the BEP in its efforts to develop an effective tactile feature for use in the next currency redesign. This, in turn, will help the Department of the Treasury satisfy the requirements of the Order.

(2) Use of Information

How will the information be collected?

BEP is seeking to engage in outreach with the blind and visually impaired community in order to share information about some tactile features it is considering for inclusion in its next U.S. paper currency redesign. Part of that outreach involves conducting generic surveys of blind and visually impaired persons about the effectiveness of sample tactile features. The best way to reach a variety of members of the blind and visually impaired community is through participating in conferences and events attended by blind and visually impaired persons, as well as outreach conducted through BEP-hosted meetings, focus groups or other gatherings. For example, many conferences and events are held across the country throughout the year. It is believed that these conferences attract individuals from a variety of backgrounds and conference attendees are representative of the broad economic, age, gender and ethnic groups encompassed by the blind and visually impaired community. At a minimum, BEP intends to send representatives to each of the following conferences across the country:

- National Federation of the Blind (NFB) 6/30 thru 7/5 Dallas, TX
- American Council of the Blind (ACB) 7/6 thru 7/14 Louisville, KY

- Association of Education and Rehabilitation for the Blind (AER) 7/18 thru 7/22 Bellevue, WA
- NFB 12/1 Baltimore, MD

The BEP intends to send personnel to a variety of conferences, including those listed above, and to set up an information booth in the exhibit hall or other public space available at each conference. Any interested conference attendees can come to BEP's booth and learn about BEP's efforts to develop tactile features for incorporation into future currency designs. BEP personnel will have available sample coupons with tactile features that interested persons may touch in order to better understand the types of features under consideration. The sample coupons are the same size and feel as U.S. paper currency and include a clear, transparent, raised tactile feature, but are either printed with generic images or unprinted.

The BEP will ask any blind and visually impaired visitors to its booth if they would like to respond to questions about the tactile features. If a blind and visually impaired visitor is interested in providing feedback, a BEP employee manning the booth will ask the visitor individual questions orally, and note the visitor's responses. These responses will then be included as part of the analysis to decide which features to incorporate into future currency designs.

The BEP will also use generic surveys to gather information from blind and visually impaired individuals at other relevant conferences, events, meetings, focus groups or other gatherings, including those hosted by BEP. These surveys will be administered to participants after they have been given the opportunity to examine sample coupons or other relevant information. The results of these surveys will be used to help direct BEP's effort to provide meaningful access of currency to the blind and visually impaired population.

Information to Be Collected

The survey/information collection protocol will be developed by a subject matter expert in the field of acuity/perception studies within the blind community. In general, the acuity information and data collected should describe and measure the ease with which participants can identify the tactile feature(s) under evaluation. This will likely be expressed in terms of speed and accuracy. The specific approach to acquiring the desired acuity information and data will be determined by the subject matter expert. As the tactile feature is further developed, the sample coupons and accompanying survey questions may be further tailored or defined to allow for greater specificity in the testing administered.

Use of Information Collected

The information collected from attendees of conferences, events, meetings, focus groups or other gatherings of persons who are blind or visually impaired will be used by BEP to develop an effective tactile feature for use in the next currency redesign, providing meaningful access to denominate United States paper currency. Information collected from individual interviews at the conferences, events, meetings, focus groups and other gatherings will not be used to make a

final determination, but will be part of a larger data set used to decide on the best and most helpful tactile features to be included in the next currency redesign.

(3) Use of Information Technology

This is a limited collection of information from conference, event, meeting, focus groups or other gathering attendees. Automated, electronic, mechanical, or other technological collection techniques or other forms of information technology will not be used for purposes of collecting this information as the collection depends on the subjects being able to personally touch and examine the relevant coupon samples. A BEP employee will then ask each respondent questions as detailed in the appropriate test protocol that will be used. The responses will be recorded in accordance with the data collection method prescribed in the test protocol.

(4) Efforts to Identify Duplication

No similar information already available can be used or modified for the purposes of this information collection. The questions are being asked about specific tactile features that are in the process of design and development. As such, there is no similar information available that will help the BEP assess the efficacy of the particular samples that it plans to test.

The BEP had researched to ascertain if any testing or information collections had been performed earlier, and which might be able to be used for its present purposes. Some acuity testing has been performed. Earlier acuity testing, however, cannot be used for the BEP's present purposes because the BEP will be asking for feedback about specific sample tactile features which are being considered for incorporation into U.S. paper currency. Previous tests involved samples and features different from those being contemplated for use in United States currency designs.

(5) Impact on Small Entities

The data collection is not anticipated to burden small entities.

(6) Consequences of Less Frequent Collection and Obstacles to Burden Reduction

Consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

The best chance BEP has of engaging in outreach and asking questions of blind and visually impaired persons is to meet with them directly at conferences, events, meetings, focus groups and other gatherings of persons who are blind or visually impaired. These are initial collections aimed at communicating to the blind and visually impaired community that BEP is working to provide them meaningful access to paper currency. BEP's outreach efforts also provide a chance to ask questions about some of the variety of tactile features it is considering. The feedback from these surveys, along with feedback that BEP will seek through other information collections (for which BEP will seek approval under the Paperwork Reduction Act)

is crucial to the BEP's goal of providing meaningful access to U.S. paper currency for blind and visually impaired persons.

The inability of BEP to collect this information means that BEP will have less direct input from the community of individuals for whom tactile features are being developed - blind and visually impaired persons.

(7) Circumstances Requiring Special Information Collection

There are no special circumstances involved in this information collection. The testing is not a statistical survey, nor does it require the use of a statistical data classification.

(8) Solicitation of Comments on Information Collection

As required by 5 CFR 1320.8(d), a notice of this proposed data collection appeared in the *Federal Register*, Vol. 77, No. 19, p. 4626-27 on January 30, 2012. There were no public comments.

(9) Payment or Gift to Respondents, Other Than Remuneration of Contractors or Grantees

Respondents will not be receiving payments or gifts for their feedback.

(10) Assurance of Confidentiality

Participants will be informed:

1. Why the information is being collected;
2. How the information provided during the testing will be used;
3. The burden estimated by the BEP; (approximately 10 to 20 minutes per participant)
4. The nature of their response, which in this case will be voluntary;
5. The information shared by each will be protected and remain private to the extent permitted by law.
6. Further, participants will be notified of BEP's need to display or otherwise inform them of a currently valid OMB control number. To the extent that number is available, it will be provided.

The BEP will not ask a participant for his or her name, address, phone number, social security number, or for any other information that may be personally identifiable.

(11) Justification of Sensitive Questions

The BEP will not be asking sensitive questions.

(12) Estimated Burden of Information Collection

| Type of Intake | Estimated Number of Respondents | Estimated Number of Intakes per Respondent | Average Burden Hours per Intake | Estimated Total Annual Burden Hours Requested |
|---------------------|---------------------------------|--|---------------------------------|---|
| In-Person Questions | 500 | 1 | 10 – 20 minutes | 167 hours |

The burden hours are calculated based upon the following:

BEP commissioned a comprehensive acuity study in late 2011 in which blind and visually impaired persons evaluated samples and answered questions about various tactile features BEP is considering for inclusion in future U.S. paper currency designs. Though that information collection was disapproved, BEP learned that the average time to obtain feedback from participants in the acuity study was approximately 60 minutes. BEP is using that information to estimate the time for responding to questions during future conferences, events, meetings, focus groups, or other gatherings.

As part of its outreach efforts, BEP sent employees to conferences in 2011 to share information about its efforts to ensure meaningful access to U.S. paper currency. The BEP had approximately 62 visitors to its booth at the 2011 CSUN Conference. Based on that total, BEP has estimated about 500 total visitors per year assuming BEP is able to attend a variety of conferences, events, meetings, focus groups or other gatherings.

(13) Estimated Total Annual Cost Burden to Respondents

There will be no annualized capital or start-up costs for the respondents to collect and submit this information.

(14) Estimated Cost to the Federal Government

The BEP anticipates incurring minimal cost in the collection of this information. Sample coupons were manufactured in conjunction with development activities associated with the overall project to develop and evaluate a variety of designs of raised tactile features. The actual cost associated with producing individual samples has not been captured. Even if BEP employees are not allowed to collect information, they will be attending the various conferences and events to provide information to visitors about meaningful access efforts. Thus, the time and expense undertaken by BEP to send its employees to the conferences and events is not attributable to this collection of information.

(15) Reasons for Change in Burden

Not applicable. This information collection is part of a new program.

(16) Plans for Tabulation, Statistical Analysis, and Publication

Publication and Tabulation

The BEP will not publish the results of this information collection. The results may be shared with BEP's stakeholders as part of the process of considering tactile features for incorporation into future currency designs. The information is meant to be interpreted only in light of a small pool of respondents estimated to be 500 in number.

The information will give BEP and its stakeholders basic ideas of the effectiveness of tactile features developed to date. The stakeholders who will work with the BEP in reviewing the information collection include: The Department of the Treasury, the Federal Reserve Board of Governors, the Currency Technology Office, the United States Secret Service, and the Central Bank Cash Machine Group ("CBCMG"), a consortium comprised of BEP, its stakeholders, other central banks throughout the world, and members of the banknote equipment manufacturing industry; the CBCMG discusses issues pertaining to the handling and processing of U.S. paper currency and other currencies throughout the world.

Statistical Analysis

Complex analytical techniques will not be employed in this outreach effort. BEP may provide basic, descriptive statistics about the numbers and the nature of responses received from respondents (e.g., what percentage of respondents stated a preference for one particular tactile feature over another). No statistical analysis, however, will be utilized to extrapolate the results of this information collection to a broader population of blind and visually impaired persons.

(17) Reasons Why Displaying the OMB Expiration Date is Inappropriate

Not applicable. The expiration date for OMB approval will be displayed on any form utilized for the information collection.

(18) Exceptions to Certification Requirement of OMB Form 83-I

Not applicable. The BEP is not requesting any exceptions to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act Submissions".