

### Justification for Nonmaterial/Nonsubstantive Change

The Department is submitting a no-material change request to OMB for the ICR, because the Department's contractor (ICF) has found it more difficult than anticipated to recruit focus group participants. In designing the original ICR, the Department and ICF thought that providing pension plan fiduciaries with an opportunity to share their experience with the 408(b)(2) regulation would provide sufficient incentive for them to participate. That, however, has not been the case. As a result, the Department and ICF have explored ways to increase focus group participation and have concluded that offering limited cash or gift card incentives may be an effective recruitment tool. Therefore, the Department is hereby requesting OMB to approve providing focus group participants with cash or a gift card limited to a maximum of \$45 for their participation.

Below is an estimate of the cost of offering the incentive.

<b>Focus Groups</b>	<b>Number of Respondents Over 1 Year</b>	<b>Cost Per Respondent</b>	<b>Total Burden Hours Over 1 Year</b>
<b>Lower range</b> (estimated at 70 respondents total for 8 Focus groups)	70	\$45	\$3,150
<b>Upper range</b> (estimated at 100 respondents total for 8 focus groups)	100	\$45	\$4,500
<b>Midpoint</b>	85	\$45	\$3,825