SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION 1530-NEW

Analysis to Support Electronic Funds Transfer and Remittance Mandate

B. Collections of Information Employing Statistical Methods

Fiscal Service is proposing an expanded information collection approach aimed at conducting exploratory focus groups and phone interviews. This will help to inform Fiscal Service of the challenges involved in collecting information from the unbanked and under banked population and enhance the design of the collection instruments as needed. The number of individuals participating in the focus groups can be increased, when feasible, allowing for the opportunity to obtain additional voices that can be used to expand upon and validate previously gathered information. The expanded responding population targeted for the focus groups is now 60 individuals instead of the original 36 and the number of targeted individuals for the phone interviews is 10 instead of 6.

Fiscal Service is also considered the second option provided at the meeting: expanding the focus group survey to the entire Treasury to obtain a master survey on the unbanked and under banked. However, the Treasury has determined this option is not feasible because:

- The unbanked and under banked population is just one (though important) part of the research for the EFT Regulatory Impact Analysis (RIA);
- The information obtained from the focus groups will be supplemented with existing data from other sources rather than used solely as the justifying data; and
- The amount of resources (both staff and funding) needed to conduct such a master survey is too large for the appropriated money for the current project/contract.

1. Universe and Respondent Selection.

The potential respondent universe in the information collection includes individuals, small businesses and other entities that may be adversely affected by the proposed regulatory change. This primarily includes those individuals or groups using non-electronic mechanisms to settle transactions with the Federal government.

Fiscal Service will work with contractors, Federal agencies, the Small Business Administration (SBA), the Wharton School of the University of Pennsylvania (Wharton School), and community-based financial service programs for the unbanked and under banked population in the Philadelphia metropolitan area, among other stakeholders, to identify the respondent universe from which information will be collected. Selection of eligible respondents will be initially determined from collaboration with the Wharton School and associated community-based advocacy groups that provide financial counseling services to the unbanked and under banked in the Philadelphia metro area. If necessary, Fiscal Service will augment the respondent universe identified above through the review of historical and current Federal agency transaction databases. The resulting information will be used to characterize the respondent universe (e.g., number of transactions, size of transaction, preferred method, business size, location, etc.). The data will be further segmented according to different demographic groups and the size of entity affected. If necessary, a series of electronic data match algorithms will be performed against applicable databases (e.g., Dun and Bradstreet) to further characterize and identify eligible respondents.

The final list of potential small business respondents will be reviewed with the SBA Office of Advocacy to solicit and consider its views and opinions on the degree to which the identified universe captures the impacted community. Respondents will be recruited by telephone or e-mail contact.

Due to budgetary and financial constraints, as well as a compressed regulatory schedule, Fiscal Service does not intend to use statistical methods, such as sampling, imputation, or other statistical estimation techniques, for its collection. The data collected will be used primarily for consideration and input into the development of economic analyses required by law (EO 12866 'Regulatory Planning and Review' and 5 USC 601-612 'Regulatory Flexibility Act'), rather than to produce estimates about the population. The objective is to interview selected segments of the population that meet the specific characteristics identified above, rather than a probability sample of the population. Results will not be used to make statements representative of the universe of study, to produce statistical descriptions, or to generalize the data beyond the scope of the sample.

The accuracy, reliability, and applicability of the results of these collection instruments are adequate for their purpose and will be used to triangulate and validate the assessments and findings from publicly available data sets, such as the *2013 FDIC National Survey of Unbanked and Underbanked*, *Computer and Internet Access in the United States: 2013*, *2009 National Household Travel Survey, and Department of Treasury payment data*. The samples associated with this collection are not subjected to the same scrutiny as scientifically drawn samples where estimates are published or otherwise released to the public.

2. Procedures for Collecting Information.

Recruitment: The external contractor will recruit respondents, identified from collaboration with community-based advocacy groups that provide financial counseling services to the unbanked and under banked in the Philadelphia metro area and rural Pennsylvania through email communications and telephone calls. The public will have the choice of participating in the collections. Their participation is voluntary. If the respondent possesses the desired characteristics and agrees to participate, a phone interview will proceed or an invitation to a phone interview at a determined time or a scheduled focus group will be distributed.

Phone Interview: Recruitment calls will be made to potential respondents identified in the steps noted above. Reading from a pre-developed phone script and questionnaire, the external contractor will provide the respondent with an explanation of the purpose of the interview, a description of the study, and the procedures to be used. The respondent is then given an assurance of privacy to read. This assurance is then reread orally by the interviewer to the respondent.

Respondents that volunteer to participate in the collection will either proceed with the interview at that time or indicate a more convenient time with which to schedule the interview. For phone interviews scheduled at a later date or time, a reminder email will be sent providing the time of the interview.

Phone interviews are expected to last approximately 60 minutes, but may conclude in less time depending on the level of detail the respondent chooses to provide in response to each question.

Focus Group: Recruitment will involve both email communications and telephone calls. Once an interview is scheduled, it is the responsibility of the respondent (from the public sector) to travel to the interview site. The interview site for all focus groups will be a private room within a local community venue (e.g., church, community center) in or around the Philadelphia metro area. To reduce the number of no-shows, scheduled volunteers will be sent a reminder letter providing the time and location of the interview, as well as directions to the focus group venue. Volunteers should also receive a reminder telephone call before the interview.

When the respondent arrives, he/she will receive an explanation of the purpose of the interview and the procedures to be used. The respondent will then be asked to read a brief description of the study or a description of the study will be presented orally. The respondent is then given an assurance of privacy to read. This assurance is then reread orally by the interviewer to the respondent. No video or audio recordings will be included in the collection of information.

- Focus group interviews will consist of approximately 12 people per group and are expected to last approximately 90 minutes. However, the goal is to target additional participants for a total of 60.
  . In these small group sessions, respondents will be asked questions related to the methods of payment, and their associated costs and/or burdens, used to settle collections from the Federal government. Participants will be asked to respond openly to each question based on their individual experience. The moderator will attempt to involve everyone in each question to better understand attitudes, opinions, and concerns.

Debriefing: All respondents should be debriefed. This procedure reiterates the purpose of the project and answers respondents' questions regarding the study. All respondents will be provided with an address to offer comments concerning the data collection process and the Office of Management and Budget (OMB) Control Number.

3. Methods to Maximize Response.

To maximize response rates, Fiscal Service will partner with Federal agencies (e.g., Advisory Committee on Economic Inclusion (ComE-IN), Alliance for Economic Inclusion (AEI)), SBA, the Wharton School, community-based financial service programs for the unbanked and under banked population in the Philadelphia metro area and rural Pennsylvania, and other stakeholders interested in the unbanked or underbanked (e.g., American Association of Retired Persons (AARP), the Urban League, BankOn.org) to identify a universe of eligible respondents that meet the characteristics related to the collection. Efforts will also be made to conduct the focus groups at locations in and around the targeted communities of Philadelphia and Pennsylvania at large, and consideration will be given to holding the interviews outside of normal business hours (e.g., weekends) for greater convenience and participation.

For the phone interviews, respondents will be recruited by telephone and/or email until the desired level of participation is achieved.

For the focus groups, respondents will be recruited by telephone and/or email contact. Fiscal Service will primarily leverage partnerships with the Wharton School and associated financial counseling service programs and groups serving the under and unbanked in Philadelphia to identify eligible individual and small business respondents. Support will also be enlisted from the SBA Office of Advocacy, as necessary, to identify small businesses and other entities receptive to participating in the focus groups in order to increase response rates.

As noted above, to reduce the number of focus group absentees, scheduled volunteer participants for the focus groups will be sent a reminder email providing the time and location of the interview, as well as directions to the focus group venue. They will also receive a reminder telephone call before the interview. Respondents that volunteered to participate in a phone interview, but requested it be scheduled at a later time, will be sent a reminder email providing the time of the interview.

4. Testing of Procedures.

Pretests are generally conducted for all collections. We will develop a series of semi-structured interview guides and outreach materials for the phone interviews and focus groups. We will also develop an initial list of questions and then validate and test these questions with the Fiscal Service Technical Lead and a limited number of other stakeholders (e.g., SBA, customers) to finalize the list. If the number of pretest respondents will exceed nine (9) members of the public, Fiscal Service will submit the pretest instruments for review under this generic clearance.

5. Contacts for Statistical Aspects and Data Collection.

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