# SUPPORTING STATEMENT OMB Number 1535-0138

**A. Justification for:** TreasuryDirect: an electronic process for selling/issuing, servicing, and making payments on or redeeming U.S. securities

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Chapter 31 of Title 31 of the United States Code authorizes the Secretary of the Treasury to prescribe the terms and conditions, including the form of issue, of United States Treasury certificates of indebtedness.) Currently, securities are issued via the TreasuryDirect system, an electronic process for selling/issuing, servicing, and making payments on or redeeming U.S. securities.
- **2. Indicate how, by whom, and for what purpose the information is to be used.** The information is used by the Department of the Treasury, Bureau of the Fiscal Service to establish new accounts and process any associated transactions in the electronic system.
- 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. What consideration is given to use information technology to reduce burden?

The primary method of collection is an online system that removes the burden of processing requests submitted on paper forms. The collection of the information is conducted one time for numerous purchases removing the requirement to submit the same data with each transaction. The customer has access for viewing the status and number of any given security on-line at their convenience eliminating the processing of paper inquiries. The greatest advantage of this change is a direct relationship with our customers while promoting their self-reliance for account maintenance. TreasuryDirect provides a one-stop shopping experience for our customers where they can buy and manage their savings bonds, T-bills, notes and bonds totally online. To prevent on-line fraud, forms for the purposes of updating bank account information and transferring securities are available in the system to download and sign before a certifying officer.

- 4. Describe efforts to identify duplication. Why can't any similar information already available be used or modified for use for the purposes described in item 2 above? No other federal governmental agency collects this type of information, therefore, no duplication exists. Where possible, the collection of the information is conducted one time for numerous purchases removing the requirement to submit the same data with each transaction.
- 5. If the collection of information impacts small business or other small entities describe any methods used to minimize burden? This collection of information does not impact small business or other small entities.

6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?

The TreasuryDirect system is the primary way for an individual to purchase securities directly from the Federal government. The government uses these purchases to help manage the national debt and finance its services.

7. Is this collection of information conducted in a manner consistent with the guidelines of 5 CFR 1320.6?

The collection of information cannot be conducted less frequently because the collection is initiated for a single purpose.

8. What effort was made to notify the general public about this collection of information?

The Bureau's notice was published in the Federal Register on December 1, 2015, Page 75163. No comments were received.

9. What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?

There are no payments or gifts made to respondents.

# **10.** What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?

Aside from protections contained in the Privacy Act, there is no guarantee of confidentiality.

## 11. What justification is there for questions of a sensitive nature?

The Bureau of the Fiscal Service conducts a Privacy Impact Assessment (PIA) on information systems collecting personally identifiable information from the public. We do PIAs to ensure that:

- we tell the public the information that we collect about them,
- we adequately address impacts these systems have on personal privacy,
- we collect only enough personal information to administer our programs, and no more

Also, PIAs confirm that we use the information for the purpose intended; that the information remains timely and accurate; that it is protected while we have it, and we hold it only for as long as we need it.

The PIA for the TreasuryDirect system is available at http://fiscal.treasury.gov/fsreports/rpt/fspia/TreasuryDirectPrivacyImpactAssessment.pdf

## 12. What is the estimated hour burden of this collection of information?

Based on an analysis of user interaction with the TreasuryDirect system the typical user took:

- An average of six minutes to complete an account establishment transaction; and
- An average of two minutes to complete an account update transaction.

These are averages based on the fact that initial transactions require more time than updates to existing information. Based on these findings, the total annual burden hours for the TreasuryDirect system are estimated as follows:

Initial Account Establishment			
Description	Total	Total Burden	
	Transactions	Hours	
Establishing new primary accounts, 6 minutes each	112,000	11,200	
Establishing new linked accounts, 3 minutes each	46,000	2,300	
Certifying new primary accounts that failed			
verification, 5 minutes each	39,000	3,250	
• On-line transaction = 37,830;			
• Off-line transactions via FS Form 5444 = 1,170			
Sub-Total	197,000	16,750	

Account Update Transactions		
Sales, 2 minutes each	1,057,000	35,233
Redemptions without Customer Service (CS)	675,000	22,500
assistance, 2 minutes each		
Redemptions with CS assistance, 30 minutes each		
• On-line transaction = 17,460;	18,000	9,000
• Off-line transactions via FS Form 5446 = 540		
Transfers (internal and external), 2 minutes each		
• On-line transaction = 272,570;	281,000	140,500
• Off-line transactions via FS Form 5511 = 8,430		
Banking information updates, 2 minutes		
• On-line transaction = 40,740;	42,000	21,000
• Off-line transactions via FS Form 5512 = 1,260		
Account updates and other transactions without CS	2,800,000	93,333
assistance, 2 minutes		
Account updates and other transactions with CS		
assistance, 30 minutes	26,000	12,000
• On-line transaction = 25,220;	26,000	13,000
• Off-line transactions via FS Form 5446 = 780		
Sub-Total	4,899,000	334,566

TOTAL		
Initial Account Establishment	197,000	16,750
Account Update Transactions	4,899,000	334,566
Total estimated annual burden hours:	5,096,000	351,316

13. What is the estimated total annual cost burden to respondents or recordkeepers resulting from this collection of information?

Estimated cost burden to respondents is not available.

#### 14. What is the annualized cost to the Federal Government?

Projected costs of operation for the TreasuryDirect system are 5.243 million dollars annually. Actual costs for the paperwork burden to the system are not available.

15. What is the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I?

An examination of the TreasuryDirect system indicates that the amount of transactions conducted online amounts to an increase of the total burden hours. The increase of 254,548 hours is an adjustment in agency estimate for a total of 351,316 burden hours requested.

**16.** For collections of information whose results will be published, outline plans for tabulation and publication.

The results of the collection of this information will not be published for statistical use.

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

The public interest will be better served by not displaying an expiration date on the online system or associated forms. The time period during which the current editions will continue to be usable cannot be predicted. It could easily span several cycles of review and OMB clearance renewal. Displaying the expiration date would make it necessary to update the electronic form and website where it is accessed after each renewal. Additionally, not displaying the expiration date on the forms will avoid confusion among members of the public who may have identical forms with different expiration dates in their possession. By not displaying the expiration date, supplies of the form could continue to be used regardless of when the OMB approval has expired. This would reduce costs incurred through additional printing and desktop publishing.

#### 18. What are the exceptions to the certification statement?

There are no exceptions to the certification statement.

#### B. This collection does not employ statistical methods.