

SUPPORTING STATEMENT - PART A

(Federal Post Card Application – 0704-0503)

1. Need for the Information Collection

The Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA), 52 U.S.C. § 203, requires the Presidential designee (Secretary of Defense) to prescribe an official form containing an absentee voter registration and ballot request application for use by the States to permit absent uniformed services voters and overseas voters to participate in general, special, primary and runoff elections for Federal office. The authority for the States to collect personal information comes from UOCAVA. The burden for collecting this information resides in the States. The Federal government neither collects nor retains any personal information associated with this form.

2. Use of the Information

The collected information will be used by State and local election officials to process uniformed service members, spouses and overseas citizens who submit their information to register to vote or receive an absentee ballot. The collected information will be retained by election officials to provide election materials, including absentee ballots, to the uniformed services, their eligible family members and overseas voters during the form's eligibility period provided by State law. No information from the Federal Post Card Application (FPCA) is collected or retained by the Federal government. The FPCA is completed in hardcopy or via the Federal Voting Assistance Program's (FVAP) online assistant (fvap.gov), and then submitted by the voter to an Election Official through mail, email, or fax (depending on State instructions). Per the law, FVAP regularly reaches out to UOCAVA citizens in order to raise awareness of its voting assistance services, primarily via its website, FVAP.gov.

3. Use of Information Technology

The Federal Voting Assistance Program does not collect responses to the FPCA. Neither does any other federal entity. The individual States set standards and legislate for the possibility of electronic submission.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Businesses

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

The applicant is required to update and resubmit the information annually, whenever they change their mailing address or as otherwise required by State law. If the information is not submitted annually or whenever they change their mailing address, the applicant may not receive ballots for elections for Federal office in that calendar year.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice for the collection published on Tuesday, February 28, 2017. The 60-Day FRN citation is 82 FRN 12084.

105 comments were received during the 60-Day Comment Period. They are included on a separate document with our Agency's response to the comments. The spreadsheet containing the comments reflects the structure of the newly designed FPCA. Since this was a complete redesign of the form, each of the commenters had numerous suggestions on multiple components of each section. As a result, there were hundreds of unique comments collected for the FPCA during the public review period. FVAP provided an answer of Accepted, Rejected, or Non-substantial to each comment, and included a rationale for all rejected and non-substantial comments. The comments themselves varied widely as a result of the feedback from election officials, designers, and end users. Overall, the feedback was very positive and constructive. All of the comments were evaluated by subject-matter experts. The criteria for doing so were based on legality under UOCAVA and the likelihood of a voter completing the form correctly according to extensive usability testing.

The redesign and usability testing of the FPCA was carried out by a team of researchers, including a form designer and plain language expert, user experience researchers, and experts in qualitative research methods and voting research. The research team created several rounds of prototypes and conducted usability testing to make recommendations and iterative improvements on the design of the form. The active contribution of policymakers, stakeholders, and research participants led to the development of the form that was reviewed by the public during the 60-Day period. The key findings from usability testing that influenced the new design were:

1. Simplify instructions. Participants tended not to read instructions, or they assumed the instructions didn't pertain to them unless specifically told otherwise. As a result, the new form has fewer instructions and directs voters to FVAP.gov for more

information. Color was also added to resolve key sticking points, and remaining instructions we clarified to minimize voter confusion and follow plain language standards.

2. Revise structure. The flow of the old form didn't follow a logical progression, leading voters to miss or skip important sections. Accordingly, the new form was restructured to follow a simpler configuration of "Who are you?", "Where are you?", and "How would you like to receive your ballot?"
3. Revise questions. During the 2016 election numerous voters were upset that the old form required them to provide their Race and Sex. Usability testing confirmed this sentiment. Since neither component is legally required to be on the form, both were removed.

Once the user-tested redesign of the FPCA was complete, the form was posted for public review. Nearly without exception, commenters found the new form to be an improvement over the old one, and they provided constructive feedback to further enhance it. The key comments that influenced the new design were:

1. Improve clarity and legibility. Numerous commenters provided recommendations that made the form easier for voters to complete and election officials to process. Primarily these included adding the language "Print clearly in blue or black ink" on the front of the form, shifting columns to allow more space for longer responses, and rearranging some of the fields to provide more room for answers.
2. Edit the instructions. Most commenters offered alternative wording to titles, headers, and instructions throughout the form. Some of these were rejected because they reflected state specific regulations that don't pertain to UOCAVA voters, or they injected more confusion for the voter based on the usability study. Many of the recommendations were accepted either verbatim or with edits, resulting in much better language throughout the FPCA.
3. Revise SSN section. Many commenters criticized the SSN section for a variety of reasons ranging from privacy to confusing layout. Because some states require a SSN for voting purposes, the section remained in its original location on the form. However, the instructions beneath the field and the "OR" were removed in favor of more details being provided on the other side of the form.

A 30-Day Federal Register Notice for the collection published on Thursday, July 13, 2017. The 30-Day FRN citation is 82 FRN 32347.

35 comments were received during the 30-Day Comment Period. They are included on a separate document with our Agency's response to the comment. The same methodology from the 60-Day review was employed. The active contribution of the participants led to the final version of the form that will be published. The key comments that influenced the final design were:

1. Improve clarity and legibility. Many commenters still expressed concern that voters filling the form out by hand would be challenged due to the space provided. To

accommodate this sentiment, a new section was created, some sections were condensed, and the overall fillable space was increased.

2. Rearrange the Name section. During the previous comment period many election officials requested that Last Name be listed first. This change was made, but most of the commenters in this period found that the order was counterintuitive, so the name section was further revised.
3. Add "Sex" back. Several states expressed a concern that while sex is not a UOCAVA requirement, it did assist them to register voters correctly, and one state would reject the FPCA if the voter didn't indicate their sex. Since this change was relatively minor, the original language from the previous version was added back in.

Overall, the comments from the 30-Day period were fewer but still substantial. Many of the comments repeated feedback similar to the 60-Day period. Review by subject-matter experts determined that these requests either reflected state requirements not specified by UOCAVA, or they failed to improve the user's ability to successfully submit the form. The accepted changes mentioned above were incorporated into the final version of the FPCA for publication.

Part B: CONSULTATION

A thorough battery of usability testing was conducted to determine the clarity of the form and whether it is achieving its intended use. This collection represents the final product of numerous design iterations, user feedback and subject matter expert comments.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

There is a precedent of providing a Privacy Act Statement to the respondent on this form. It is located beside the instructions, below the Agency Disclosure Statement. It is important to note that the information is collected and retained by individual States, counties and municipalities. It is not in the possession of the Federal government.

A System of Record Notice (SORN) is not required for this collection because records are not retrievable by PII.

A Privacy Impact Assessment (PIA) is not required for this collection because PII is not being collected electronically.

The information is collected and retained by individual States, counties and municipalities. It is not in the possession of the Federal government.

11. Sensitive Questions

The respondent's complete or partial Social Security Number is required to meet certain State voter registration requirements. The purpose and use of this information is determined by the States. FVAP does not collect or use this information.

12. Respondent Burden and its Labor Costs

a. Estimation of Respondent Burden

1. [Federal Post Card Application]

- a. Number of Respondents: 1,200,000
- b. Number of Responses Per Respondent: 1
- c. Number of Total Annual Responses: 1,200,000
- d. Response Time: 0.25 hours
- e. Respondent Burden Hours: 300,000 hours

2. Total Submission Burden

- a. Total Number of Respondents: 1,200,000
- b. Total Number of Annual Responses: 1,200,000
- c. Total Respondent Burden Hours: 300,000 hours

b. Labor Cost of Respondent Burden

1. [Federal Post Card Application]

- a. Number of Total Annual Responses: 1,200,000
- b. Response Time: 0.25 hours
- c. Respondent Hourly Wage: \$22.52
- d. Labor Burden per Response: \$5.63
- e. Total Labor Burden: \$6,756,000

2. Overall Labor Burden

- a. Total Number of Annual Responses: 1,200,000
- b. Total Labor Burden: \$6,756,000

The Respondent hourly wage was determined by using the Department of Labor Wage Website (<http://www.dol.gov/dol/topic/wages/index.htm>)

13. Respondent Costs Other Than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

The information is not collected and processed by the Federal government. The cost of collecting and processing the information is borne by the individual State and local election offices as part of providing voter registration and election services to citizens claiming their state as legal residence.

FVAP purchases hardcopy forms from GSA for distribution to installations, organizations, and individuals that request them for use in trainings and as ballot requests. Some of the Services purchase hardcopy forms for distribution to individuals who are unable to access the electronic version.

a. Labor Cost to the Federal Government

1. **[Federal Post Card Application]**

- a. Number of Total Annual Responses: 0
- b. Processing Time per Response: 0 hours
- c. Hourly Wage of Worker(s) Processing Responses: \$0
- d. Cost to Process Each Response: \$0
- e. Total Cost to Process Responses: \$0

2. **Overall Labor Burden to Federal Government**

- a. Total Number of Annual Responses: 0
- b. Total Labor Burden: \$0

b. Operational and Maintenance Costs

- a. Equipment: \$0
- b. Printing: \$50,000
- c. Postage: \$0
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$0
- g. Total: \$50,000

- 1. Total Operational and Maintenance Costs: \$50,000
- 2. Total Labor Cost to the Federal Government: \$0
- 3. Total Cost to the Federal Government: \$50,000

15. Reasons for Change in Burden

This is a revision of a currently approved collection. The increase in cost to the respondent is due only to an increase in DOL's hourly wage index. There is no change to the total number of respondents or burden hours.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are requesting continued approval to omit the expiration date. This form is stocked by Federal and non-government agencies for distribution to and use by uniformed services, their eligible family members and overseas voters. If the form contains the OMB expiration date, voters may believe they will continue to receive absentee ballots beyond what is allowed by State law. This confusion would disenfranchise citizens. Additionally, requiring the form to be revised and reissued on a triennial basis would incur unnecessary expense where previous versions of the form meet UOCAVA requirements. Furthermore, voters who only have access to an “expired” form may not realize it can be used for voter registration and ballot request purposes, and would thus be disenfranchised.

18. Exceptions to “Certification for Paperwork Reduction Submissions”

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.