

SUPPORTING STATEMENT

1530-0065

A. Justification for: Subscription For Purchase and Issue of U.S. Treasury Securities, State and Local Government Series.”

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The information collected is essential for the establishment and maintenance of State and Local Government (SLG) security accounts. Requested information is used to issue a Statement of Account to the entity, calculate interest and to pay the redemption proceeds. (Refer to 31 CFR, Part 344.2 - Regulations Governing Securities of the State and Local Government Series.)

- 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 and maintain State and Local Government (SLG) security accounts. Without the information, the required transactions and account activity cannot be completed.

- 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 forms to establish and maintain subscriber accounts are available from the Bureau of the Fiscal Service and also on the Internet as a fill-in PDF form. Currently, most activity occurs within SLG Safe, the secure Internet application available for subscribers to manage a SLGS portfolio. The SLG Safe system collects identical information collected by the forms and is included in the overall burden.

- 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 similar information is on file because the collection of information is made only for a specific purpose.

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 collection of information cannot be conducted less frequently because the collection is initiated for a single purpose described in question 1 above. Without this information, the requested transaction could not be completed at the request of the owner.

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

This information collection is consistent with 5 CFR 1320.6 There are no special circumstances that would cause information collected to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, pre-tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by the authority established in the statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has

instituted procedures to protect the information's confidentiality to the extent permitted by law.

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 March 26, 2018, Page 13006. No comments were received.

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

Gifts or payments are not provided 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?

There are no questions of a sensitive nature. Personally identifiable information (PII) collected in this collection such as tax identification number and financial institution information is necessary to support a request for early redemption. An applicable System of Records Notice was published August 17, 2011 that applies if a customer seeking a waiver submits sensitive information. System of Records Name:

Treasury/BPD.003 – United States Securities (Other than Savings-Type Securities).

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 administration of SLGS is included in the PIA for Debt Information Management Systems (DIMS) available at https://www.fiscal.treasury.gov/fsreports/rpt/fspia/DIMS_PIA.pdf

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

The estimated burden of 2,578 hours from 6,437 respondents is calculated as follows:

<i>Type of Instrument</i>	<i>Responses</i>	<i>Minutes to Complete</i>	<i>Total Minutes to Complete</i>	<i>Hours to Complete</i>
Time Cases Issued (FS Form 4144 Series.)	4,474	30	134,220	2,237
Demand Cases Issued (FS Form 5237)	239	8	1,912	32
Early Redemption Time Deposit (FS Form 5377)	494	30	14,820	247
Early Redemption Time Deposit (FS Form 5238)	1,230	3	3,690	62
Total	6,437			2,578

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?

The following factors were used to estimate the annual burden to this agency:

- a. Printing cost - estimated number of forms printed annually, multiplied by the unit cost of the forms.
- b. Case processing cost – estimated number of forms completed, multiplied by a percentage of the unit cost of case processing.

- c. Forms management cost - salary cost of forms management personnel.

Printing Cost	6,437	\$20.00/per thousand	\$129.00
Case Processing Cost	6,437	\$.90/form	\$5,793.00
Forms Management Cost			\$500.00
Total Cost			\$6,422.00

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

This ICR is being revised to include burden for the related Form 5377, which is currently covered by OMB Control Number 1530-0039. This results in an increase of 247 hours of burden due to agency discretion, which will be offset when 1530-0039 is discontinued following approval of this consolidation.

Responses for each instrument were also updated based on actual usage, resulting in reduction of 382 hours due to updated estimates. Combined, there is a decrease of 135 hours in the total burden requested in this ICR.

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 this series of forms. The time period during which the current edition of the forms 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 form 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.