Supporting Statement OMB No. 1530-0028

- A. JUSTIFICATION: FS Form 1522; "Special Form of Request for Payment of United States Savings and Retirement Securities Where Use of a Detached Request is Authorized."
- 1. Explain the circumstances that make this collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

The information collected is necessary to request payment of United States Savings Bonds, Savings Notes, Retirement Plan Bonds, and Individual Retirement Bonds.

2. Indicate how, by whom and for what purpose is this information used?

The information on the completed form is used by the Department of the Treasury, Bureau of the Fiscal Service to identify the securities involved and to obtain a certified request for payment. Without the information, the transaction 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 form is available from the Bureau of the Fiscal Service and also on the Internet as a fill-in PDF form.

4. Describe efforts are used to identity duplication? Why can't any similar information already available be used or modified for use for the purposes described in Item 2 above?

The information on the form is collected for a single purpose when requesting payment of United States Savings Bonds, Savings Notes, Retirement Plan Bonds, and Individual Retirement Bonds. No other federal governmental agency collects this type of information, therefore, no duplication exists.

5. If this collection of information impacts small businesses or other small entities, what methods are 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?

Information requested on the form is voluntary, however, without the use of this form, the Bureau of the Fiscal Service and its agents would not have the ability to issue securities, process transactions, make payments, and identify owners and their accounts.

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 February 5 2019, page 1834. 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?

There are no questions of a sensitive nature. Personally identifiable information (PII) collected on this form, such as name and address, is necessary to identify the registered owner(s) and verify his/her identity. An applicable System of Records Notice for this information was published August 17, 2011. System of Records Name: Treasury/BPD.002 – United States Savings-Type Securities and Treasury/BPD.009 – U.S. Treasury Securities Fraud Information Systems. The privacy impact assessment (PIA) conducted for this collection of information can be found at https://www.fiscal.treasury.gov/files/pia/SaBRe-PIA.pdf

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

The average time needed is 15 minutes per response multiplied by the estimated number of responses (14,000) reflects the total burden of 3,500 hours.

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

This form is completed primarily by individuals in their personal capacity, thus no actual labor costs are expected to be incurred by respondents. Accounting for the value of a respondent's time using the national average wage for all occupations of \$24.98¹, the estimated labor costs for completing the form would total \$87,430.

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 14,000@ 0.02/form = 280Case Processing Cost: 14,000 1.50/form = 21,000 Forms Management Cost 0.02/form = 21,000Total Cost 0.02/form = 21,0000.02/form = 21,000

¹ Bureau of Labor Statistics, *May 2018 National Occupational Employment and Wage Estimates United States*, https://www.bls.gov/oes/current/oes_nat.htm

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

There is a reduction of 2,250 burden hours from those previously approved by OMB. This is a program change due to agency discretion as the form is used in processes related to securities that are no longer issued in paper form.

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 FS Form 1522. The time period during which the current edition of the form 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.

B. This collection does not employ statistical methods.