

# Supporting Statement for Paperwork Reduction Act Submissions

OMB Number 1530-0013

FS Form 2887: Application Form for U.S. Department of the Treasury Stored Value Card (SVC) Program

FS Form 5752: Authorization to Disclose Information Related To Stored Value Account

## A. Justification:

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Stored-Value Cards (SVCs) are smart cards with electronic value. The card's embedded computer chip contains the value. The technology eliminates coin, currency, scrip, vouchers, money orders, and other labor-intensive payment mechanisms in closed Government locations, such as military bases and ships at sea.

This information is collected under the authority in: 31 U.S.C. 321, General Authority of the Secretary of the Treasury; Pub. L. 104-134, Debt Collection Improvement Act of 1996, as amended; Department of Defense Financial Management Regulation (DoDFMR) 7000.14-R, as amended; 5 U.S.C. 5514, Installment deduction for indebtedness to the United States; 31 U.S.C. 1322, Payments of unclaimed trust fund amounts and refund of amounts erroneously deposited; 31 U.S.C. 3720, Collection of payments; 31 U.S.C. 3720A, Reduction of tax refund by amount of debt; 31 U.S.C. 7701, Taxpayer identifying number; 37 U.S.C. 1007, Deductions from pay; 31 CFR 210, Federal Government Participation in the Automated Clearing House; 31 CFR 285, Debt Collection Authorities under the Debt Collection Improvement Act of 1996; and E.O. 9397 (SSN), as amended.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The forms are used to collect information from individuals requesting enrollment in the Treasury SVC program, to obtain authorization to initiate debit and credit entries to their bank or credit union accounts to load value on the cards, to facilitate collection of any delinquent amounts that may become due and owing as a result of the use of the cards, and as authorization to disclose cardholder information related to the SVC.

The information on the forms may be disclosed as generally permitted under 5 U.S.C. Section 552(a)(b) of the Privacy Act of 1974, as amended. It may be disclosed outside of the U.S. Department of the Treasury to its Fiscal and Financial Agents and their contractors involved in providing SVC services, or to the Department of Defense (DoD) for the purpose of administering the Treasury SVC programs. This information may only be disclosed to Federal, State, or local government agencies that have identified a need to access this information for only those uses

that have been identified in Treasury/FMS's System of Records Notice which was published in the *Federal Register* October 15, 2012, at 77 FR 62616, as TREAS/FMS .017.

**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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Both paper and electronic forms with electronic signature are used for enrollment into the Treasury SVC programs. The forms are available in electronic format to be dispersed by download or email. The Treasury Navy Cash/Marine Cash SVC program has implemented electronic signature capture and automated enrollment. This capability has reduced the overall reporting burden for this collection of information. Far fewer hardcopy enrollment forms need to be packaged and sent to the Treasury Financial Agent to be scanned and stored on file electronically.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

FS Form 2887 is a critical element in the Treasury SVC program. The information is used for a single purpose and not collected by any other Government agency. A signed Application Form for U.S. Department of the Treasury Stored Value Card (SVC) Program is the enforceable agreement between the SVC program and the individual and must be on file for every individual. By signing the form, individuals authorize debits and credits to their bank and credit union account, consent to immediate collection from pay for any negative balances that result from use of the SVC, and authorize the Government to initiate debt collection procedures for amounts that remain or become due and owing from the use of the SVC.

The new supplemental form, FS Form 2889, will be equally critical when a visitor or contractor enrolls in the Treasury SVC program. The information is used for a single purpose and not collected by any other Government agency.

FS Form 5752 is also a critical element in the Treasury SVC program. The information is used for a single purpose and not collected by any other Government agency. By filling out, signing, and dating an Authorization to Disclose Information Related To Stored Value Account, an individual SVC cardholder can authorize disclosure of account information, transaction history, or any PII concerning his/her own SVC account information, e.g., to a military or civilian law enforcement agency to investigate fraudulent use of the card or account.

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

The collection of information applies only to individuals, not to small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Disclosure of the information requested on the forms is voluntary; however, failure to furnish the requested information may significantly delay or prevent participation in the Treasury SVC program.

**7. Explain any special circumstances that would cause an information collection 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; etc.**

No special circumstances exist. The information collected from the forms is initiated for a single purpose.

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The Bureau's notice to revise the collection was published in the *Federal Register* on June 28, 2019, page 31141. No public comments were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

There are no payments or gifts made to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

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

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature. Personally identifiable information (PII) collected on the forms such as name, social security number, and financial institution information is necessary for the purpose of administering the Treasury SVC programs. An applicable System of

Records notice for collection of Treasury SVC program-related information was published in the *Federal Register* on October 15, 2012, at 77 FR 62616, as TREAS/FMS .017.

**12. Provide estimates of the hour burden of the collection of information. The statement should: \*indicate the number of respondents, frequency of response, annual hour burden; and an explanation of how the burden was estimated.**

It is estimated that 81,000 individuals will request enrollment in the Treasury SVC program each year through submitting FS Form 2887. The reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The total annual burden is estimated to be 13,500 hours.

Respondents for FS Form 2887 are US Military personnel 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 is challenging as pay rates vary widely and servicemembers are paid on a monthly, not hourly, basis. For purposes of monetizing labor costs, an E-5 with 10 years of service earns \$3,376 per month<sup>1</sup>, or roughly \$19.41/hour assuming a 40-hour workweek. Multiplied by 13,500 hours, the estimated labor costs for completing FS Form 2887 would total \$24,263.

An estimated 21,000 contractors who are not employees of the Department of Defense will be required to complete the new supplemental form, FS Form 2889, when requesting enrollment in the Treasury SVC program. The reporting burden for this collection of information is estimated to average 10 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The total annual burden is estimated to be 3,500 hours.

Contractors likewise occupy a wide range of occupations, thus labor costs are calculated by taking the national average wage for all occupations of \$24.98/hour and increasing it by 43% to account for the total employer cost of compensation (incl. benefits, taxes and overhead). The resulting fully-loaded wage rate is \$35.72.<sup>2</sup> Multiplied by 3,500 hours, the estimated labor costs for completing FS Form 2889 would total \$125,020.

Authorization to disclose related SVC account information through submitting FS Form 5752 is estimated to be necessary for 30 individuals on an annual basis. The reporting burden for this collection instrument is estimated to average 1 minute per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The total annual burden is estimated to be .5 hours. Multiplied by the military wage rate of \$19.41/hour, the estimated labor costs for completing FS Form 5752 would total \$10.

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<sup>1</sup> US Navy, Monthly Basic Pay Table 2019, <https://www.navy.com/sites/default/files/2019-02/MilPayTable2019-1-FullTime.pdf>

<sup>2</sup> Wage data taken from the Bureau of Labor Statistics, "Occupational Employment Statistics, May 2018." [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)

The chart below summarizes the total burden anticipated for this collection.

<b>Burden Estimate: 1530-0013</b>				
<b>Form Name and Number</b>	<b>Estimated Respondents</b>	<b>Estimated Time per Respondent</b>	<b>Estimated Burden</b>	<b>Estimated Labor Cost</b>
FS Form 2887: Application Form for U.S. Department of the Treasury Stored Value Card (SVC) Program	81,000	10 minutes	13,500 hours	\$262,035
FS Form 2889: U.S. Department of the Treasury Stored Value Card Contractor Agreement	21,000	10 minutes	3,500 hours	\$125,020
FS Form 5752: Authorization to Disclose Information Related To Stored Value Account	30	1 minute	.5 hours	\$10
<b>Total estimated annual burden hours:</b>	<b>102,030 respondents</b>		<b>17,000.5 hours</b>	<b>\$ 387,065</b>

**13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

The annual non-labor cost to respondents is nominal. The respondent would be required to complete the form (by hand or fillable PDF), sign it, then return it. There are no startup costs or operational and maintenance costs.

**14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The forms are available as an electronic file that can be printed on site as needed then filled out and signed manually by individuals requesting enrollment or authorization. The hardcopy application forms, signed by each applicant, are double-wrapped and forwarded to the Treasury Fiscal or Financial Agent by each field unit or Navy ship at least once every 30 days via traceable means, e.g., FedEx, UPS, registered mail. The total estimated cost to print the forms on site as needed and to ship the completed forms to the Treasury Fiscal or Financial Agent for processing is \$45,000 and is covered by the annual operating funds allocated to the units equipped with SVC systems by the individual Services within the Department of Defense. The costs to process the application forms are included in Treasury’s overall reimbursement to the Fiscal and Financial Agents to operate the SVC program.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

Enrolling contractors in the Treasury SVC program is estimated to increase use of FS Form 2887 by 35% resulting in an additional 21,000 respondents. Those same 21,000 respondents will be required to complete a new supplemental form, FS Form 2889: U.S. Department of the Treasury Stored Value Card Contractor Agreement. The additional respondents and addition of the supplemental form represents a total increase of 42,000 responses and 7,000 hours for an adjustment in agency estimate for a total of 17,001 burden hours requested.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

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 the information collection, explain the reasons that display would be inappropriate.**

The public interest will be better served by not displaying an expiration date on this collection 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. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

There are no exceptions to the certification statement.

#### **B. Collections of Information Employing Statistical Methods**

**The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:**

No statistical methods are being employed for this collection of information.