

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION 1530-0022

A. Justifications

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.

This is a generic clearance to conduct customer satisfaction surveys, focus groups, and interviews among recipients of federal benefit and vendor payments through EFT. The collection of information has been active since 2003 with an original focus on Federal beneficiaries who receive their payments via checks. It was designed to uncover barriers to EFT use, probe preferred instruments for receiving payments and test product development, delivery mechanisms, and potential policy changes that may facilitate conversion to electronic payment instruments, primarily direct deposit. Follow up studies included qualitative testing of television and other types of advertising designed for the Social Security check recipient audience, and a telephone survey concerning attitudes toward direct deposit among general audience consumers. The need for this market research continues to arise from a Congressional directive that accompanied legislation enacted in 1996, as part of the Debt Collection Improvement Act (Pub. L. No. 104-134), expanding the scope of check recipients required to use direct deposit to receive Federal benefit payments (see 31 U.S.C. 3332). Congress directed Treasury to “study the socioeconomic and demographic characteristics of those who currently do not have Direct Deposit and determine how best to increase usage among all groups.” 142 Cong. Rec. H4090 (daily ed. April 25, 1996).

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 information collected pursuant to this collection of information has been, and will continue to be, used by the Bureau of the Fiscal Service (Fiscal Service) to increase the efficiency of Fiscal Service’s marketing campaign (known as *Go Direct*) to persuade check recipients to switch to direct deposit. The research has been used by Fiscal Service to target key markets and hone in on the types of communications and messages that will move the most benefit recipients to direct deposit. Fiscal Service/Treasury estimates that the government will continue to see more savings through converting Federal beneficiary check recipients to direct deposit.

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.

In appropriate situations, Fiscal Service will collect information electronically and/or use online

collaboration tools to reduce burden.

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.

No similar data are gathered or maintained by Fiscal Service or are available from other sources known to the Bureau.

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.

Fiscal Service studies to date, and anticipated studies in the future, involve individuals only. No small businesses or small entities will be impacted.

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.

Without feedback from the target audiences of federal benefit check recipients, Fiscal Service will not have timely information to adjust its services to meet customer needs.

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.

There are no such special circumstances.

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 was published in the Federal Register on September 12, 2019, Page 48213. No comments were received.

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

Survey respondents may be offered incentive that would be limited to \$40 for cognitive research and \$75 for focus group participants. Generally for quantitative surveys, respondents are not offered an incentive. Any incentive will be identified and justified in each generic IC submitted under this information collection.

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

There is no guarantee of confidentiality. The results of the research is for statistical purposes only; responses will be grouped for aggregate reporting purposes only to be shared with employees of Fiscal Service/Treasury, or third-party vendors conducting the study. However, all individual responses will remain completely confidential and will not be shared with anyone as required by law. Interviews conducted through focus groups and interviews will be provided as transcripts without any identifying information about an individual respondent.

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.

Questions in individual surveys submitted under this collection are based on the customer experience to determine satisfaction levels and explore ways to enhance future services; therefore, there are no questions of a sensitive nature.

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.

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (5,200) are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Average Time per Response	Total Hours
Customer Feedback Surveys	19,500	1	16 min.	5,200

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

The surveys responses will be given by individuals in their personal capacity, thus no actual labor costs are expected to be incurred by respondents. In certain circumstances described in section 9, respondents may be compensated for their time. However, accounting for the value of a respondent's time using the national average wage for all occupations of \$24.98¹ (and excluding any compensation received), the estimated labor costs for all respondents would total \$129,896.

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

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 cost to the Federal Government varies for the individual studies covered in the generic collection. Costs may include: survey design, pre-testing, translations, professional services, computer programming, data collection, data processing, analysis, report preparation and report presentation for all of the phases of the studies. Costs will be reported with individual collections when submitted for approval.

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

There is no change in burden.

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.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general service improvement, but are not for publication or other public release.

Although the Bureau does not intend to publish its findings, Fiscal Service may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). Fiscal Service will disseminate the findings when appropriate, strictly following the Bureau's "Guidelines for Ensuring the Quality of Information Disseminated to the Public.", and will include specific discussion of the limitation of the qualitative results discussed above.

Additional information regarding analytical techniques and time schedules are provided to OMB with each request for survey clearance under this generic survey approval.

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.

No exemption is requested.

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 in Form 83-1, Item 19.