

**Supporting Statement**  
**U.S. Department of the Treasury**  
**Office of Cybersecurity and Critical Infrastructure Protection**  
**Financial Sector Information Collection**  
**OMB 1505-0265**

Survey to Identify and Analyze the Operations Dependencies of Financial Services Sector Critical Functions

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

- 1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.**

The potential respondent universe numbers approximately fifty (50) total respondents. This includes all financial services firms identified as Section 9 in Executive Order 13636, as well as additional systemically important institutions and market utilities (not designated Section 9) that provide or support critical services, functions, and operations based on market share. Treasury anticipates a response rate of approximately fifty percent (50%), with a higher response rate among the Section 9 firms given Treasury's more regular interaction with those firms.

- 2. Describe the procedures for the collection of information including:**

Treasury has not employed a statistical methodology as this information collection is not being conducted among a sample, but instead the entire Section 9 population and additional critical entities. Treasury intends to reduce respondent burden by requesting an initial information collection, with any subsequent information collection(s) being limited to critical updates and/or changes in the data. Treasury does not intend to seek this information on more than a semi-annual basis.

- 3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

Treasury intends to maximize response rates through extensive outreach among respondents. Treasury maintains regular and robust engagement with the anticipated respondent pool as part of its routine SSA duties, and also has established relationships with several sector associations and organizations, including the Financial Services Sector Coordinating Council (FSSCC). FSSCC leadership has indicated to Treasury a desire to support this effort and encourage and facilitate responses among its member firms as appropriate. The Financial and Banking Infrastructure Information Committee (FBIIIC), which includes all Federal financial regulatory agencies and which Treasury chairs, has also expressed support for this information collection. Treasury anticipates FSSCC and FBIIIC support, along with the triannual joint FSSCC/FBIIIC meetings, will reduce the nonresponse rate.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.**

Treasury has tested the functionality of the Access database file that will be used by respondents to record and submit information. Treasury has not tested specific survey questions.

- 5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the bureau unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the bureau.**

Include all individuals who have contributed to or commented on the survey, sample frame, statistical methods or other aspects of the collection.

*Consulted:*

David Lacquement, U.S. Department of the Treasury, (202) 622-1173  
Alexandra Friedman, U.S. Department of the Treasury, (202) 622-1543  
Cameron Dicker, U.S. Department of the Treasury, (202) 622-2058  
Elizabeth Irwin, U.S. Department of the Treasury, (202) 622-3376

*Consulted and will conduct analysis:*

Adam Pastrich, U.S. Department of the Treasury, (202) 622-0435  
Tara McGovern, Institute for Defense Analyses, (703) 578-2804  
Richard White, Institute for Defense Analyses, (703) 845-2120  
Theresa Mitchell, Institute for Defense Analyses, (703) 845-2160  
Brian Vickers, Institute for Defense Analyses, (703) 845-6899  
Robert Stimets, Institute for Defense Analyses, (703) 845-6744

*Will conduct analysis only:*

Kelly Tran, Institute for Defense Analyses, (703) 845-2517