

PART A – JUSTIFICATION

Supporting Statement **OMB 1520-0009**

Request for OMB Approval of a Generic Clearance for Collection of Information at Conferences

A. Justification

1. Circumstances Making the Collection of Information Necessary.

A court order was issued in *American Council of the Blind v. Paulson*, 591 F. Supp. 2d 1 (D.D.C. 2008), requiring the Department of the Treasury to “provide meaningful access to United States currency for blind and other visually impaired persons, which steps shall be completed, in connection with each denomination of currency, not later than the date when a redesign of that denomination is next approved by the Secretary of the Treasury . . .” *Id.* The Department is also obligated to “file periodic status reports describing the steps taken to implement this Order and Judgment.” *Id.* Under terms of the Order, the Department must file status reports every six months until it has fully complied with the Order.

On May 31, 2011, the Secretary of the Treasury approved implementation of three accommodations; among them will be the addition of a tactile feature to Federal Reserve notes, to be “introduced in the next currency redesign”. The requested data collection will help the Bureau of Engraving and Printing (BEP) in its efforts to develop an effective tactile feature for use in the next currency redesign. This, in turn, will help the Department of the Treasury satisfy the requirements of the Order.

2. Purpose and Use of the Information Collection.

How will the information be collected?

BEP is seeking to engage in outreach with the blind and visually impaired community to share information about some tactile features it is considering for inclusion in its next U.S. paper currency redesign. Part of that outreach involves conducting generic surveys of blind and visually impaired persons about the effectiveness of sample tactile features. A good way to reach a variety of members of the blind and visually impaired community is through participating in conferences and events attended by blind and visually impaired persons, as well as outreach conducted through BEP-hosted meetings, focus groups or other gatherings. For example, many conferences and events are held across the country throughout the year. It is our expectation that these conferences attract individuals from a variety of backgrounds and conference attendees are generally representative of the broad economic, age, gender and ethnic groups encompassed by the blind and visually impaired community, as they are publicly advertised. At a minimum, BEP intends to send representatives to conferences and blind organizations across the country such as:

- National Federation of the Blind (NFB) National Convention

- American Council of the Blind (ACB) Annual Conference and Convention
- California State University Northridge Center on Disabilities (CSUN) Assistive Technology Disability Conference.

The BEP intends to send personnel to a variety of conferences, including those listed above, to set up a meaningful access information booth in the exhibit hall or other public space available at each conference. At the meaningful access information booth any interested attendee can learn about BEP's efforts regarding meaningful access including the U.S. Currency Reader Program and, if available, development of tactile features. In addition, iBill currency readers are distributed to assist in denominating U.S. currency to eligible individuals. Further, when sample coupons are available, BEP intends to coordinate a series of focus groups or small meetings of interested parties to collect their feedback on potential tactile features. At that time, BEP personnel will have available sample coupons with tactile features that interested persons may touch to better understand the feature under consideration. The sample coupons are the same size and feel as U.S. paper currency. These responses will then be included as part of the analysis to determine how well the selected feature is performing.

Information to Be Collected

The survey/information collection protocol is based on methods developed by a subject matter expert in the field of acuity/perception studies within the blind community. In general, the acuity information and data collected should describe and measure the ease with which participants can identify the tactile feature(s) under evaluation. This will likely be expressed in terms of accuracy and speed. The sample coupons and accompanying survey questions will inform the BEP on the effectiveness of the feature.

Use of Information Collected

The information collected from attendees of conferences, events, meetings, focus groups or other gatherings of persons who are blind or visually impaired will be used by BEP to assess the tactile feature for use in the next currency redesign assisting in providing meaningful access to denominate United States paper currency. Information collected from individual interviews at the conferences, events, meetings, focus groups and other gatherings will not be used to make a final determination, but will be part of a larger data set used to decide on the best and most helpful tactile features to be included in the next currency redesign.

3. Consideration Given to Information Technology.

This is a limited collection of information from conference, event, meeting, focus group or other gathering attendees. Automated, electronic, mechanical, or other technological collection techniques or other forms of information technology will not be used for purposes of collecting this information as the collection depends on the subjects being able to personally touch and examine the relevant coupon samples. A facilitator will then ask each respondent questions as detailed in the appropriate test protocol that will be used. The responses will be recorded in accordance with the data collection method prescribed in the test protocol.

4. Duplication of Information.

No similar information already available can be used or modified for the purposes of this information collection. The questions are being asked about specific tactile features that

are in the process of design and development.

The BEP had researched to ascertain if any testing or information collections had been performed earlier, and which might be able to be used for its present purposes. Some acuity testing has been performed. Previous acuity testing data, however, cannot be used for the BEP's present purposes because the BEP will be asking for feedback about specific sample tactile features which are being considered for incorporation into U.S. paper currency.

5. Reducing the Burden on Small Entities.

The data collection is not anticipated to burden small entities.

6. Consequences of Not Conducting Collection.

The best chance BEP has of engaging in outreach and asking questions of blind and visually impaired persons is to meet with them directly at conferences, events, meetings, focus groups and other gatherings of persons who are blind or visually impaired. These are collections aimed at communicating to the blind and visually impaired community that BEP is working to provide meaningful access to paper currency. BEP's outreach efforts also provide a chance to ask questions regarding tactile features. The feedback from these surveys, along with feedback that BEP will seek through other information collections (for which BEP will seek approval under the Paperwork Reduction Act) is crucial to the BEP's goal of providing meaningful access to U.S. paper currency for blind and visually impaired persons.

The inability of BEP to collect this information means that BEP will have less direct input from the community of individuals for whom tactile features are being developed - blind and visually impaired persons.

7. Special Circumstances.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

8. Consultations with Persons Outside the Agency.

As required by 5 CFR 1320.8(d), a notice of this proposed data collection appeared in the Federal Register, Vol. 83, No. 1889, p. 48895 on August 13, 2021. There were no public comments.

9. Payment or Gift.

Each participant will receive a small payment, estimated to be \$75 or less, from the study administrator for participating in the study (\$40), and/or to offset expenses directly attributable to their participation in the study, such as taxi fare or the use of public transportation (up to \$35).

10. Confidentiality.

Participants will be informed:

1. Why the information is being collected.
2. How the information provided during the testing will be used.

3. The burden estimated by the BEP; (approximately 25 to 30 minutes per participant)
4. The nature of their response, which in this case will be voluntary.
5. The information shared by each will be protected and remain private to the extent permitted by law.
6. Further, participants will be notified of BEP's need to display or otherwise inform them of a currently valid OMB control number. To the extent that number is available, it will be provided.

The BEP will not ask a participant for his or her name, address, phone number, social security number, or for any other information that may be personally identifiable. This information will only be collected independently if required for compensation and transportation payment or if needed for currency reader applications.

11. Questions of a Sensitive Nature.

The BEP will not be asking sensitive questions.

12. Burden of Information Collection.

Type of Intake	Estimated Number of Respondents	Frequency of Response	Average Burden Hours per Intake	Estimated Total Annual Burden Hours Requested	Annualized Cost to Respondents
In-Person Questions	650	1 time	1 hour	650 Hours	\$0

The burden hours are calculated based upon the following:

BEP commissioned a comprehensive acuity study in 2014 in which blind and visually impaired persons evaluated samples and answered questions about various tactile features BEP is considering for inclusion in future U.S. paper currency designs. These periods covered 30-40 minutes. Additionally, previously approved collection opportunities at conferences, meeting and focus groups has provided engagements averaging approximately 30-40 mins. BEP is using that information to estimate the time for responding to questions during future conferences, events, meetings, focus groups, or other gatherings.

As part of its outreach efforts, BEP sent employees and representatives to conferences in recent years to share information about its efforts to ensure meaningful access to U.S. paper currency. The BEP had approximately 45-55 visitors to its conference booth and at focus group sessions. Based on these totals, BEP has estimated about 650 total visitors per year assuming BEP is able to attend a variety of conferences, events, meetings, focus groups or other gatherings.

The Annualized cost to Respondents is estimated to be \$0 as the individuals are volunteering their time and may in fact be compensated in some manner as described in section 9.

13. Annual Cost to Respondents.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Cost to the Federal Government.

Estimated costs include assistance from contractors to conduct and document the testing at a cost of \$375,000 including travel.

Each participant will receive a small payment, estimated to be \$75 or less, from the study administrator for participating in the study (\$40), and/or to offset expenses directly attributable to their participation in the study, such as taxi fare or the use of public transportation (up to \$35). With up to 650 participants the maximum estimated costs is \$48,750.

Sample coupons are being manufactured in conjunction with development activities associated with the overall project to develop and evaluate a variety of designs of raised tactile features. The actual cost associated with producing individual samples has not been captured. Even if BEP employees and representatives are not allowed to collect information, they will be attending the various conferences and events. Thus, the time and expense undertaken by BEP to send its employees and representatives to the conferences and events is not attributable to this collection of information.

15. Reason for Change.

Adjustments to costs were made to cover contractor assistance.

16. Tabulation of Results, Schedule, Analysis Plans.

Publication and Tabulation

The BEP will not publish the results of this information collection. The results may be shared with BEP's stakeholders as part of the process of considering tactile features for incorporation into future currency designs. The information is meant to be interpreted only in light of a small pool of respondents estimated to be up to 650 in number.

The information will give BEP and its stakeholder's basic ideas of the effectiveness of tactile features developed to date. The stakeholders who will work with the BEP in reviewing the information collection include: The Department of the Treasury, the Federal Reserve Board of Governors, the Currency Technology Office, the United States Secret Service, and the Central Bank Cash Machine Group ("CBCMG"), a consortium comprised of BEP, its stakeholders, other central banks throughout the world, and members of the banknote equipment manufacturing industry; the CBCMG discusses issues pertaining to the handling and processing of U.S. paper currency and other currencies throughout the world.

Statistical Analysis

BEP may provide basic, descriptive statistics about the numbers and the nature of responses received from respondents (e.g., what percentage of respondents stated a preference for one particular tactile feature over another). However, the data will not be used to extrapolate the results of this information collection to a broader population of blind

and visually impaired persons.

17. Display of OMB Approval Date.

The BEP plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to Certification for Paperwork Reduction Act Submission.

There are no exceptions to the certification statement.