

**Supporting Statement Part B for the
Ad Hoc Clearance for Board-Wide Use
(FR 3100; OMB No. 7100-NEW)**

Summary

For all information collections that involve surveys or require a statistical methodology, the Board of Governors of the Federal Reserve System (Board) is required to provide a complete justification and explanation of the use of such a methodology. For collections that employ surveys without such a methodology, the Board 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.

Background

The Board has many mechanisms to collect quantitative information from respondents. However, the Board routinely encounters situations where its activities related to the Board's mission would benefit from additional information obtained through methods that are considered collections of information under the Paperwork Reduction Act (PRA) but that are otherwise voluntary and unintrusive. For example, it is challenging for the Board to obtain registration information and solicit feedback on Board-sponsored conferences and meetings; add one-off questions to existing, privately-run surveys;¹ pre-test a version of a more rigorous statistical survey involving 10 or more respondents; or gather input on Board operations and projects or developments in the financial sector.

This clearance augments existing data collection methods by providing the Board with additional tools to informally engage with and collect, on a voluntary basis, qualitative information from respondents in an efficient and timely manner. Information gathered is used internally to improve the services, research, policies, and operations of the Board. For example, the clearance permits ongoing and collaborative communications between the Board and respondents, allowing respondents to provide feedback that could contribute directly to the improvement of Board operations or increase Board understanding a particular topic. However, the information that is be collected under this clearance does not yield data that could be generalized to the overall population, and the Board expects that it would only conduct minimal statistical analysis that would not produce universally applicable information. This information is not available from other sources.

Universe and Respondent Selection

The Board collects several categories of information (described below) via this clearance through a variety of methods, including small discussion groups; focus groups; cognitive

¹ The Board has considered the use of small surveys conducted by non-Federal entities (such as universities and for-profit institutions) as vehicles to gain insights into certain areas of interest. If questions were to be added to such surveys, the survey would be required to inform respondents which questions were added by the Board and to display the OMB control number and Paperwork Reduction Act statement, as required by all Board information collections.

laboratory studies, such as those used to refine questions or assess usability of a website; qualitative customer satisfaction surveys (e.g., post-transaction surveys or opt-out web surveys); and other surveys and questionnaires. Individual information collections may be conducted in-person, via telephone or paper, or electronically, through, for example, mobile devices or virtual meetings. The Board collects information electronically and uses online tools to reduce burden where appropriate.

1. **Public Engagement on the Financial System:** The Board uses the FR 3100 to augment its understanding of the financial system and current economic and financial events through outreach to relevant stakeholders. Previously, this has been accomplished through informal outreach. For example, the Board recently gained insights on financial and digital asset technologies and their impacts on banking institutions and the financial system via targeted engagement with specific firms and organizations. This effort has helped the Board support responsible innovation in the financial sector. Under the FR 3100, information may be collected, for example, via web- or email-based surveys, telephone surveys, virtual or in-person interviews, paper-based surveys, or focus groups.
2. **Enhancing Administration of Board Programs:** A core goal of the Board is to optimize its operations and capabilities and, in particular, to enhance the efficiency and effectiveness of supervision and regulatory activities. Adapting and improving Board programs requires soliciting feedback from Board-supervised institutions and the general public. The Board uses the FR 3100 to gather the views of interested parties in a variety of ways, including hosting Board-sponsored conferences and conducting focused outreach. Information that is collected may include experiences with Board programs, reasons for wanting to participate in Board programs, and ideas for improving Board programs. The Board may, for example, conduct informal surveys to identify strengths and weaknesses of current Board services and make improvements in service delivery based on feedback, to test response rates for future surveys, or to compare results of small inquiries to the results of larger, more rigorous studies.
3. **Research Projects:** The Board uses the FR 3100 to conduct low-burden, low-impact research projects, such as seeking information from schools, state and local governments or other public institutions, or specific small groups of private citizens. Such projects may involve seeking easily provided information or public records of interest to the Board. Information collected may be used to generate ideas about possible future projects (such as currency design, educational outreach, or public relations campaigns), but is not used to provide sole justification for such initiatives and would not yield data that could be generalized to the overall population. Such data uses would require more rigorous designs that would require a separate PRA clearance with public notice and opportunity for comment.

The FR 3100 panel comprises individuals, institutions, state and local governments, and other persons of interest to the Board.

Procedures for Collecting Information

Data collection methods and procedures will vary and the specifics of these will be provided with each collection request. The Board expects to use a variety of methodologies for these collections. For example, the Board or its contractors may use commercial survey-specific software to automate its collection and analysis of feedback. In addition to physical copies, information collection instruments may be electronically disseminated and/or posted on target pages of the Board's web site. Telephone scripts, personal interviews, and focus groups with professional guidance and moderation may also be used.

Each program will obtain information from statisticians in the development, design, conduct, and analysis of surveys, when appropriate. This statistical expertise will be available from agency statisticians or from contractors and the Board will include the names and contact information of persons consulted in the specific information collection requests submitted under this clearance.

Methods to Maximize Response

The samples associated with this collection are not subject to the same scrutiny as scientifically drawn samples in which estimates are published or otherwise released to the public. Information collected under this clearance will not yield generalizable quantitative findings. It can provide useful respondent input, but it does not yield data about opinions that can be generalized.

Testing of Procedures

Pretesting may be done with internal staff, a limited number of external colleagues, and/or stakeholders who are familiar with the programs and products. If the number of pretest respondents exceeds nine members of the public, the Board will submit the pretest instruments for review under this clearance.