

March X, 2023

Memorandum to: William E. Bestani, FDIC Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

From: Manuel E. Cabeza, Counsel
Assessments and Legislation Unit
Federal Deposit Insurance Corporation

RE: FDIC Survey of Volunteer Income Tax Assistance (VITA) Providers

Volunteer Income Tax Assistance (VITA) providers assist low-income households in filling out their federal tax returns. These providers offer a unique opportunity to potentially increase economic inclusion by connecting unbanked households served at VITA sites with banks or credit unions, which allows these households to more quickly and safely access refunds through direct deposit.

Under the generic clearance titled, “Generic Information Collection for Qualitative Research” (3064-0198), the FDIC submits for OMB review a request to field a one-time generic survey of VITA providers. The purpose of the survey is to better understand efforts in place by VITA providers to help their unbanked clients open checking or savings accounts. Of VITA providers that currently partner with banks or credit unions, we will ask about their practices and which practices clients are most interested in (20 minute survey). Of VITA providers that do not currently partner with banks or credit unions, we will ask questions related to the barriers they perceive in forming partnerships (15 minute survey).

The FDIC would like to send an invitation to the generic survey on May 1, shortly after the tax season ends, but while the tax season is still fresh on the minds of staff and volunteers. For the 2023 tax season there exists about 3,700 distinct VITA sites. We will ask about 600 VITA providers to fill out the survey, with an expectation that approximately 180 sites will respond. The invitation will be sent directly to the VITA Site Program Manager, whom we believe is the best person to answer the survey questions. The total estimated burden to the public of the generic survey is 48 hours.

The anticipated burden for staff from VITA providers is calculated as follows:

Types of Sites	Number of Sites Expected to Respond	Estimated Time Burden
Sites currently partnering with banks or credit unions	36 ¹	20 minute survey x 36 sites = 720 minutes (12 hours)
Sites with no partnerships	144	15 minute survey x 144 sites = 2,160 minutes (36 hours)
Total	180 Sites	48 Hours

If you have any questions, please do let me know. Thank you for your consideration.

¹ Prosperity Now, a non-profit that has created the “Tax Opportunity Network” for VITA providers, estimates that about 20 percent of VITA umbrella organizations currently operate sites that have partnerships with banks or credit unions. Therefore, we estimate that about 36 (20 percent of 180) partnered sites will respond.