

# Supporting Statement

---

*OMB Number 1530-0065*

*Subscription For Purchase and Issue of U.S. Treasury Securities, State and Local Government Series.*

## **Summary of Changes for renewal in 2024:**

Q8: Current Federal Register citation was added.

Q12: The estimated Annual Respondent Cost was omitted from previous Supporting Statements.

Q14: The factors used to calculate the cost to the Federal Government were updated in this response.

Q15: Justification for the increased burden hours.

### **A. Justification:**

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The information collected is essential for the establishment and maintenance of State and Local Government (SLG) security accounts. Requested information is used to issue a Statement of Account to the entity, calculate interest and to pay the redemption proceeds. (Refer to 26 U.S.C. 141 note; 31 U.S.C. 3102; and 31 CFR, Part 344.2 - Regulations Governing Securities of the State and Local Government Series.)

- 2. Indicate how, by whom, and for what purpose the information is to be used.**

The information is used by the Department of the Treasury, Bureau of the Fiscal Service to establish and maintain State and Local Government (SLG) security accounts. Without the information, the required transactions and account activity cannot be completed.

- 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. What consideration is given to use information technology to reduce burden?**

The forms to establish and maintain subscriber accounts are available from the Bureau of the Fiscal Service and also on the Internet as a fill-in PDF form. Currently, most activity occurs within SLG Safe, the secure

Internet application available for subscribers to manage a SLGS portfolio. The SLGSafe system collects identical information collected by the forms and is included in the overall burden.

**4. Describe efforts to identify duplication. Why can't any similar information already available be used or modified for use for the purposes described in item 2 above?**

No similar information is on file because the collection of information is made only for a specific purpose.

**5. If the collection of information impacts small business or other small entities describe any methods used to minimize burden?**

This collection of information does not impact small business or other small entities.

**6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?**

The collection of information cannot be conducted less frequently because the collection is initiated for a single purpose described in question 1 above. Without this information, the requested transaction could not be completed at the request of the owner.

**7. Is this collection of information conducted in a manner consistent with the guidelines of 5 CFR 1320.6?**

This information collection is consistent with 5 CFR 1320.6 There are no special circumstances that would cause information collected 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;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, pre-tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;

- requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by the authority established in the statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

**8. What effort was made to notify the general public about this collection of information?**

The Bureau's notice was published in Volume 89 of the Federal Register on August 16, 2024, page 66760. No comments were received.

**9. What decision was made to provide any payment or gift to respondents, other than reenumeration of contractors or grantees?**

Gifts or payments are not provided to respondents.

**10. What assurance of confidentiality was provided to respondents and what was the basis for the assurance in statute, regulations, or agency policy?**

Aside from protections contained in the Privacy Act, there is no guarantee of confidentiality.

**11. What justification is there for questions of a sensitive nature?**

There are no questions of a sensitive nature. Personally identifiable information (PII) collected in this collection such as tax identification number and financial institution information is necessary to support a request for early redemption. An applicable System of Records Notice was published February 27, 2020 that applies if a customer seeking a waiver submits sensitive information. System of Records Name: Treasury/ Fiscal Service .014—United States Securities and Access.

The Bureau of the Fiscal Service conducts a Privacy Impact Assessment (PIA) on information systems collecting personally identifiable information from the public. We do PIAs to ensure that:

- we tell the public the information that we collect about them,
- we adequately address impacts these systems have on personal privacy,

- we collect only enough personal information to administer our programs, and no more

Also, PIAs confirm that we use the information for the purpose intended; that the information remains timely and accurate; that it is protected while we have it, and we hold it only for as long as we need it.

The administration of SLGS is included in the PIA for Debt Information Management Systems (DIMS) available at <https://www.fiscal.treasury.gov/files/pia/dims-pcia.pdf>

**12. What is the estimated hour burden of this collection of information?**

The estimated burden of 2,706 hours from 7,105 respondents is calculated as follows:

<i>Type of Instrument</i>	<i>Responses</i>	<i>Minutes to Complete</i>	<i>Total Minutes to Complete</i>	<i>Hours to Complete</i>
Account Set-up and Maintenance (FS Form 4144 Series.)	4,986	30	149,580	2,493
Demand Cases Issued (FS Form 5237)	453	8	3,624	60
Demand Redemption (FS Form 5238)	1,584	5	7,920	132
Early Redemption Time Deposit (FS Form 5377)	82	15	1,230	21
<b>Total</b>	<b>7,105</b>			<b>2,705.9</b>

b. Estimate of Annual Respondent Cost.

Form	No. of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate <sup>1</sup>	Total Annual Respondent Cost
4144	4,986	1	30 minutes (0.5 hours)	2,493	\$72.43	\$180,567.99
5237	453	1	8 minutes (0.1333 hours)	60	\$72.43	\$4,345.80
5238	1,584	1	5 minutes (0.083 hours)	132	\$72.43	\$9,560.76
5377	82	1	15 minutes (0.25 hours)	21	\$72.43	\$1,521.03
<b>Total Respondent Cost:</b>						<b>\$195,995.58</b>

**13. What is the estimated total annual cost burden to respondents or recordkeepers resulting from this collection of information?** There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

**14. What is the annualized cost to the Federal Government?**

In general, Fiscal Service has determined that there are no annualized non-labor, printing, or distribution costs to the Government associated with this information collection. Fiscal Service processes this collection to verify the validity of the transaction requested by the owner and to maintain a record of the request. In addition, there are no printing and

---

<sup>1</sup> It is expected that respondents to this collection could be from the Financial Specialist occupation with an average wage rate of 51.01 per hour according to the May 2023 National Occupational Employment and Wage Estimates. [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm) A benefit multiplier of 1.42 is used to calculate a fully-loaded wage rate of  $\$51.01 \times 1.42 = \$72.43$

Using the BLS Employer Costs for Employee Compensation – June 2023 report <https://www.bls.gov/news.release/pdf/ecec.pdf>, a benefit multiplier of 1.42 was calculated by taking the private industry worker 50<sup>th</sup> (median) wage percentile total compensation rate divided by the wages and salaries rate.  $\$41.03/\$28.97=1.42$

distribution costs associated with this collection as it is available in electronic form through the SLG Safe system.

As for Federal Government labor costs, Fiscal Service has determined that its labor costs for this information collection are limited to analyzing incoming correspondence concerning Treasury securities and securities transactions requests. Therefore, Treasury estimates its labor costs for paper submissions of this collection as follows:

GS-12 Step 5 Accountant for the locality pay area of Rest of U.S.	Fully-loaded Labor Rate/Hour <sup>2</sup>	Avg. Processing Time per Response	Labor Costs per Response	Total Responses	Total Labor Costs
	\$76.97	15 minutes	\$19.24	7,105	\$136,700.20

**15. What is the reason for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I?**

The increased responses reported in Item 12 occur primarily from Demand Deposit subscriptions and redemptions. Given the current interest rate environment, the Demand rate is much higher than normal, and customers are shifting investment to Demands because they are more liquid. Those increases are also reflected in Item 14.

**16. For collections of information whose results will be published, outline plans for tabulation and publication.**

The results of the collection of this information will not be published for statistical use.

**17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?**

The public interest will be better served by not displaying an expiration date on this series of forms. The time period during which the current edition of the forms will continue to be usable cannot be predicted. It could easily span several cycles of review and OMB clearance renewal.

---

<sup>2</sup>Federal Government Fully-loaded Labor Rate per Hour = Wage rate x a factor of 1.63 to account for benefit costs. Per the Office of Personnel Management (OPM) wage data, the hourly fully-loaded labor rate for a GS-12, step 5, Federal employee in the Parkersburg, WV (RUS) wage area is \$76.97 (\$47.22 wages plus \$29.75 in benefit costs). See the OPM website at [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/pdf/2024/RUS\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/21Tables/pdf/2024/RUS_h.pdf)

Displaying the expiration date would make it necessary to update the electronic form and website where it is accessed after each renewal. Additionally, not displaying the expiration date on the form will avoid confusion among members of the public who may have identical forms with different expiration dates in their possession. By not displaying the expiration date, supplies of the form could continue to be used regardless of when the OMB approval has expired. This would reduce costs incurred through additional printing and desktop publishing.

**18. What are the exceptions to the certification statement?**

There are no exceptions to the certification statement.