

Supporting Statement
OMB Control Number 1506-0062

Generic Information Collection Submissions
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary.

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers’ needs, the Financial Crimes Enforcement Network (hereafter the Agency) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. By qualitative feedback, we mean information that provides useful insights on perceptions and opinions, but are not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency’s programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection.

Improving agency programs requires an ongoing assessment of service delivery, by which we mean systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The Agency will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The solicitation of feedback will target areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers and stakeholders on the Agency’s services will be unavailable.

The Agency will only submit a collection for approval under this generic clearance if it meets the following conditions:

- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal government;
- The collection is noncontroversial and does not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future;
- Personally identifiable information is collected only to the extent necessary and is not retained;
- Information gathered is intended to be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency (if released, the agency must indicate the qualitative nature of the information);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;¹ and
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the normal Paperwork Reduction Act (PRA) process.

To obtain approval for a collection that meets the conditions of this generic clearance, FinCEN will submit a standardized form to OMB along with supporting documentation (e.g., a copy of the comment card). The submission will be automatically approved, unless OMB identifies issues within five business days.

The types of collections that this generic clearance covers include:

- Customer comment cards/complaint forms;
- Small discussion groups;
- Focus groups of customers, potential customers, delivery partners, or other stakeholders;
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys); or
- In-person observation testing (e.g., website or software usability tests).

¹ As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

The Agency has a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

3. Consideration Given to Information Technology.

If appropriate, the agency will collect information electronically and/or use online collaboration tools to reduce burden.

4. Duplication of Information.

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency.

5. Reducing the Burden on Small Entities.

Small businesses or other small entities may be involved in these efforts, but the Agency will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Consequences of Not Conducting Collection.

Without these types of feedback, the Agency will not have timely information to adjust its services to meet customer needs.

7. Special Circumstances.

There are no special circumstances. The information collected will be submitted voluntarily and will not be used for statistical purposes.

8. Consultations with Persons Outside the Agency.

In accordance with 5 CFR 1320.8(d), on July 29, 2026, FinCEN issued a notice and request for comments to renew an information collection for the generic clearance for the collection of qualitative feedback on agency service delivery.² The comment period closed on September 28, 2026. Two comments were received in response to the notice. Based on review of the comments received, FinCEN is proceeding with renewal without substantive changes to the approved information collection.

One comment letter did not address the subject of the notice. Another commenter asserted that the notice incorporated substantive changes and requested additional information

² See FinCEN, *Agency Information Collection Activities: Proposed Renewal; Comment Request: Renewal Without Change of the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery*, [91 FR 47915](#) (July 29, 2026) (“2026 Generic Clearance 60-Day Notice”).

regarding survey purpose and utilization; made an observation about survey response rates; questioned the reduction in estimated completion time from prior renewals; and indicated that burden estimates would be improved if they accounted for institutional coordination processes within responding organizations.

In its notice, FinCEN used a refined methodology to estimate the burden hours to complete each of FinCEN's surveys covered under the generic clearance OMB control number and to estimate the response rate related to each of those surveys. However, FinCEN did not make any changes to the FinCEN surveys currently covered under the generic control number. A list of FinCEN's surveys covered under the generic control number is available on www.reginfo.gov.³ In future notices, FinCEN will direct readers to the surveys covered by the generic control number and consider providing a more descriptive breakdown of the burden hours and responses rate estimates for each survey.

With respect to response rates, FinCEN appreciates the concern that an observed average survey response rate of approximately 13 percent may be low, but notes that the typical expected rate for voluntary web-based surveys is not substantively higher at approximately 20 percent, and does not account for rate drop-offs when surveys solicit responses to more than ten questions. FinCEN nevertheless agrees that survey effectiveness should be continuously evaluated and will continue to assess opportunities to optimize survey design and deployment, including evaluating question relevance, survey timing, and communication strategies to improve participation while maintaining the low-burden nature of the collection.

FinCEN appreciates the commenter's request for clarification regarding the change in estimated average response time from 60 minutes in the prior renewal. FinCEN estimated the time required to complete each survey based on the number and types of questions, considering actual response patterns observed from 2023 through 2025. Estimated completion times range from 8 to 27 minutes, depending on the survey, with a weighted average of approximately 17.19 minutes across all surveys.⁴ Because FinCEN is not proposing substantive changes to the surveys covered by the notice, the agency believes revising its burden estimates to comport with observed response patterns results in a more accurate burden estimate.

While FinCEN appreciates the commenter's points about certain potential respondents' institutional coordination processes, such as routing surveys to appropriate personnel or obtaining internal approvals before submission, the agency declines to revise its estimates

³ See https://www.reginfo.gov/public/do/PRAICList?ref_nbr=202308-1506-001 for a list of FinCEN surveys covered under the generic control number over the past three-year renewal period.

⁴ The revised average completion time of 17.19 minutes reflects 1,502 annual burden hours divided by 5,245 responses. This represents a minor reduction of .02 minutes, or 1.2 seconds, from the estimate in the previous notice. See Department of the Treasury, *Agency Information Collection Activities; Submission for OMB Review; Comment Request; Renewal without Change of the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery*, 91 FR 68230 (Oct. 29, 2026) ("2026 Generic Clearance 30-Day Notice").

upward for several reasons. First, the current burden estimate focuses on the direct time required to complete the survey instrument itself, which is consistent with standard PRA methodologies for voluntary customer feedback collections. Secondly, while FinCEN recognizes that some respondents may incur additional coordination time, quantifying such burden would be highly speculative given the wide variation in respondents' organizational practices. Thirdly, given the variety of surveys covered by the notice, the proportion of surveys and their intended respondents whose characteristics are sufficiently similar to the commenters' example are too low to be meaningfully generalizable (approximately five percent). The agency therefore believes the current estimate more appropriately captures the primary burden associated with these brief, voluntary feedback surveys.

9. Payment or Gift.

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the Agency may provide stipends of up to \$40. In the case of in-person focus groups, the Agency may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely, via phone, or Internet, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies, who have to travel to the agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the Agency will provide OMB with additional justifications in the request for clearance of these specific activities.

10. Confidentiality.

If a confidentiality pledge is deemed useful and feasible, the Agency will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Sensitive Nature.

No questions will be asked that are of a personal or sensitive nature.

12. Burden of Information Collection.

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (1,502) are based on the number of collections the Agency expects to conduct over the requested period for this clearance.

Frequency: As required, though generally once per year, per survey.

Estimated Average Number of Potential Respondents: 39,755.⁵

Estimated Average Number of Expected Respondents: 5,245.⁶

Estimated Total Three-Year Reporting Burden: 4,507 hours.⁷

Estimated Average Annual Reporting Burden^a

Type of Collection	No. of Respondents	Annual Frequency per Response	Minutes per Response	Total Hours
Customer Feedback Surveys	5,245	1	17.19	1,502

^a See the 2026 Generic Clearance 30-Day Notice.

13. Costs to Respondents.

No costs are anticipated.

14. Costs to Federal Government.

FinCEN publishes surveys and receives responses through electronic means. Based on the surveys administered during the last OMB control number renewal period of three years, FinCEN estimates that the cost to the Federal Government of conducting the surveys covered under the generic control number over a three-year period will be approximately \$577,497, or approximately \$192,499 on average per year.⁸

15. Reason for Change in Burden.

The total aggregate burden estimated in this renewal is 4,507 hours, which is 5,493 hours less than the estimated 10,000 hours forecast in 2023 for the previous renewal. The estimated change in total aggregate reporting burden hours, for PRA purposes on a going-forward basis, is a reduction of approximately 1,831 burden hours per year, on average.

⁵ See the 2026 Generic Clearance 30-Day Notice.

⁶ *Id.* Because some institutions may have completed multiple invitations within a given year, the number of completed surveys modestly exceeds the number of unique institutions that participated in the activities.

⁷ *Id.*

⁸ This estimate includes both contract costs of approximately \$328,175 total for the three-year period covered by this renewal, or \$109,392 per year, to administer the surveys and federal employee labor costs of \$249,321 total, or \$83,107 annually.

The total aggregate burden estimate has decreased as the net result of certain methodological changes in burden estimation. First, FinCEN is newly integrating into its estimate of the number of expected survey respondents the observed number of responses received to the same or similar surveys conducted between 2023 and 2025. This increased the total number of expected responses.⁹ Additionally, FinCEN has revised its expected survey completion time to reflect the average of the time needed to complete each type of survey deployed (as derived from testing the surveys), weighted by the proportion of total respondents who completed each type of survey. This reduced the average expected response time burden from 40 to 17.19 minutes per survey completed.¹⁰ The net effect of the increase in the number of expected responses and the decrease in the average expected survey completion time is a downward revision to FinCEN's previously estimated total aggregate burden by 5,493 hours.

16. Tabulation of Results, Schedule, Analysis Plans.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general service improvement, but are not for publication or other public release.

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of the qualitative results discussed above.

17. Display of OMB Approval Date.

FinCEN is not requesting an exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions.

These activities comply with the requirements in 5 CFR 1320.9.

⁹ In its 2023 supporting statement, FinCEN anticipated sending ten surveys per year to approximately 5,000 respondents per survey. Over the three-year approval period for this OMB control number, this equated to 15,000 responses. Based on actual survey results from 2023 to 2025, FinCEN now estimates receiving 5,245 responses annually, which equates to an estimated 15,734 responses over the three-year approval period.

¹⁰ FinCEN previously anticipated surveys would take, on average, 15 to 40 minutes to complete, by survey type, and conservatively estimated 10,000 burden hours for the three-year approval period based on the 40-minute completion time estimate. FinCEN now anticipates the surveys covered by this control number will require between eight (8) and 27 minutes to complete, with a weighted average of approximately 17.19 minutes based on the distribution of responses received by survey type during the 2023 to 2025 period.