

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR PART 1320**

AGENCY: Pension Benefit Guaranty Corporation

TITLE: Customer Service Focus Groups and Surveys

STATUS: Request for Extension of Approval of Collection of Information

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A. Justification.

1. Need for collection. Executive Order 12862, *Setting Customer Service Standards*, states the Federal Government must be customer driven. Agencies that provide significant services directly to the public must seek to provide “the highest quality of service delivered to customers by private organizations providing a comparable or analogous service.” The PBGC requests that the Office of Management and Budget approve an extension and expansion of a generic collection of information, OMB No. 1212 0053 (expires 10/31/2006), consisting of customer satisfaction focus groups and surveys.

The PBGC will consult with OMB regarding each specific information collection during the approval period. In doing so, the PBGC will provide a summary of the information collection’s objectives, burden estimates, and the proposed instruments (focus group scripts and survey questions) for inclusion in the OMB public docket. The PBGC will also submit to OMB annually a report that summarizes the actual burden, describes the results achieved, and addresses any problems or recommended revisions to the clearance.

The PBGC uses customer satisfaction focus groups and surveys to find out about the needs and expectations of its customers and assess how well it is meeting those needs and expectations. By keeping these avenues of communication open, the PBGC can continually improve service to its customers, including plan participants and beneficiaries, plan sponsors and their affiliates, plan administrators, pension practitioners, and others involved in the establishment, operation and termination of plans covered by the PBGC's insurance program. Because the areas of concern to the PBGC and its customers vary and may quickly change, it is important that the PBGC have the ability to evaluate customer concerns quickly by developing new vehicles for gathering information under this generic approval.

The focus groups and surveys will provide important information on customer attitudes about the delivery and quality of agency services and will be used as part of an ongoing process to improve PBGC programs. The PBGC's designated paperwork officer will be responsible for ensuring that individual collection applications are consistent with the Paperwork Reduction Act, implementing regulations, and the terms of the generic clearance.

The customer surveys and focus groups may gather information addressing subjects such as:

- o access to services,
- o the value of the service,
- o the quality and timeliness of the service, and
- o changes that might help improve service.

Respondents may be asked to perform activities such as:

For surveys:

- reading or listening to the instructions,
- responding to the questions, and
- returning responses to written surveys.

For focus groups:

- listening to introduction and guidelines, and
- participating in discussion.

2. Use of Information. The PBGC will use the information to determine the kind and quality of services that customers expect, desire and receive from the PBGC, to test and to develop questions for surveys, to measure achievement of legislative mandates, to assess the efficiency and effectiveness of program management, and to design solutions to current or anticipated problems.

Information previously collected from survey and focus group participants (under authority of OMB-approved collections) has led to changes designed to provide more timely service, better follow-up, and earlier and clearer communications with plan participants and pension professionals.

3. Reducing the burden. The PBGC will attempt to minimize the burden of this voluntary collection by requiring only the information necessary to achieve its objectives. In general, it is expected that each respondent will be asked to attend only one focus group or complete one survey. However, several focus groups may be conducted on the same subject in order to get a true representation of the customer universe. The PBGC will evaluate, on a continuing basis, whether, and to what extent, a particular collection of information under this generic approval may make appropriate use of automated,

electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses to reduce the burden. The PBGC will identify any such proposed use when requesting OMB approval under the generic procedures.

4. Duplicate or similar information. No similar data are gathered or maintained by any State or Federal agencies or other sources known to the PBGC.

5. Reducing the burden on small entities. Inapplicable (see item 5 on form 83-I).

6. Consequence of reduced collection. The requested collections are the minimal collections necessary to meet the high service standards established by E.O. 12862. Any reduced or less frequent collections would interfere with the PBGC's ability to identify the need for improvements in its functions and services and to respond to customer concerns.

7. Consistency with guidelines. This collection is being conducted in accordance with established guidelines.

8. Outside input. The PBGC invited public comment on the proposed information collection. 71 Fed. Reg. 26786 (May 8, 2006). No comments were received in response to the notice. The PBGC is again seeking public comment. 71 Fed. Reg. 52349 (September 5, 2006).

The PBGC periodically seeks outside review of its survey methodology and major collection instruments. The PBGC has also used focus groups to request views on alternative ways of asking questions.

9. Payments or Gifts. The PBGC's success in designing and conducting effective and reliable surveys and focus groups ultimately depends in large part on response rates

to surveys and attendance rates at focus groups. Given the substantial resources that may be invested in these collection instruments and the potential impact of decisions using data from the collection, the PBGC may need to incur costs that provide an adequate and appropriate incentive to survey respondents and participants at focus groups. A focus group stipend may also reflect the cost of transportation or parking, and focus group participants may be provided light refreshments. The PBGC will describe any such planned expenditures when consulting with OMB regarding each specific information collection during the approval period.

10. Confidentiality. Confidentiality of information is that afforded by the Freedom of Information Act and the Privacy Act. The PBGC's rules that provide and restrict access to its records are set forth in 29 CFR Parts 4901 and 4902.

11. Sensitive Questions. This collection of information does not call for submission of information of a sensitive or private nature.

12. Burden on the public. The PBGC estimates that the average annual burden will total not more than 1,400 hours for 4,200 respondents. This represents a decrease of 1,100 burden hours (from 2,500) and 5,300 respondents (from 9,500) from those the annual burdens currently approved by OMB.

The PBGC further estimates that the cost to respondents per burden hour will average \$65, resulting in a total cost of \$91,000 ($\$65 \times 1,400$). While some respondents will be professionals, such as actuaries, accountants, and lawyers, whose hourly rates typically far exceed \$65, most respondents will be retirees for whom only a minimal cost per hour (generally, minimum wage) is appropriate. The PBGC will provide specific burden estimates when requesting OMB approval under the generic procedures.

13. Costs. No capital or annual costs will be incurred by customers (respondents) in this information collection.

14. Cost to the Federal government. The PBGC will provide specific cost estimates when requesting OMB approval under the generic procedures

15. Program Change. The decrease in the estimated annual burden is due to the PBGC's reliance on the American Customer Satisfaction Index Survey (ACSI Survey), OMB Number 3090-0271, sponsored by the Department of the Treasury. The ACSI Survey reduced PBGC's need to measure customer satisfaction. The decrease also reflects the PBGC's re-evaluation of the potential number of surveys and respondents. The \$65 hourly burden reflects an increase of \$15 from the current burden of \$50 per hour and is based on an updated estimate of hourly billing rates.

16. Publication. The PBGC otherwise has no plans for tabulation or publication, although the PBGC may discuss results of the information collection in routine publications. If so, the PBGC will indicate in those publications any limitations on the methodology.

17. Display of Expiration Dates. The PBGC will display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement. There are no exceptions to the certification statement.

B. Collections of Information Employing Statistical Methods.

The PBGC will consult with OMB regarding any statistical methods that may be employed in each specific information collection during the approval period. The

PBGC's Customer Satisfaction Working Group will analyze the data collected under this approval.