

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT 1995 SUBMISSIONS
Customer Satisfaction Survey and Conference Evaluation
Generic Clearance**

A. Justification

1. Necessity of the information collection

The Department of Labor (hereafter referred to as DOL or Department) plans to continue to conduct a variety of voluntary customer satisfaction surveys and conference evaluations, which will be specifically designed to gather information from a customer's perspective as prescribed by E.O. 12862, Setting Customer Satisfaction Standards, September 11, 1993.

These customer satisfaction surveys will provide important information on customer attitudes about the delivery and quality of agency products/services and will be used as part of an ongoing process to improve DOL programs.

The following considerations will be made for all customer satisfaction surveys:

- Collect customers' opinions of what they want and their satisfaction with what they are getting.
- Provide credible confidentiality (if applicable).
- Collect information that customers perceive as innocuous and of potential benefit to them (e.g., improved products/services).
- Collect "actionable" items (items that can be changed within existing constraints).

Additionally, the following considerations will be made for all customer satisfaction surveys employing statistical methods:

- Collect information that has been pre-tested to ensure that the instruments are easy to complete and provide useful needed information.
- Include procedures necessary to ensure high response rates when it is necessary to make decisions on the results or to make generalized statements about the customers (i.e., quantitative information).

The Department is requesting to continue inclusion in this generic clearance for the use of conference evaluation forms. These evaluation forms would be used by Departmental agencies who conduct occasional user conferences to educate and inform their users both Federal and non-Federal. The evaluation forms are a valuable tool for determining the usefulness of conferences, in developing future conferences, and in providing services/products to Departmental users.

Agencies seeking to conduct a customer satisfaction survey or conference evaluation will submit a Customer Satisfaction Survey and Conference Evaluation Clearance Form, which will include the following:

Section A -- Supplemental Supporting Statement:

- Title of the Survey
- Compliance with 5 CFR 1320.5
- Assurances of confidentiality
- Federal cost
- Requested expiration date
- Number of respondents
- Percent of responses receive electronically
- Frequency
- Burden hour estimates (average response time and annual hours)
- Abstract

Section B -- Surveys And Evaluations Employing Statistical Methods

- Description of Statistical methodology (if applicable)
- Consultation with persons outside the Department
- Bureau of Labor Statistics concurrence
- Pretest information

This information will be submitted to the Office of Management and Budget (OMB) at least 15 working days prior to the start of the survey. OMB will evaluate the collection instrument for compliance with the Paperwork Reduction Act of 1995, as amended, and E.O. 12862. DOL requests OMB concurrence by email within the 15-working-day time period. All customer satisfaction surveys and conference evaluations will be voluntary and will not require record-keeping, additional research, or documentation of responses.

DOL will follow established procedures according to the Department of Labor Manual Series (DLMS) 1-300. This policy document establishes adequate internal independent review from the sponsoring programs to evaluate each customer satisfaction survey. This review will strive to address departmental as well as individual program agency concerns, goals, and objectives. The Bureau of Labor Statistics (BLS) will review and approve all customer satisfaction surveys statistical aspects in accordance with DLMS 1-300 and, as noted above, a BLS contact person will be provided for each customer satisfaction survey supplemental support statement if the collection employs statistical methods. A BLS concurrence sheet will also be provided with any comments the BLS review may have offered to the sponsor of the collection.

2. Purpose of the information collection

These customer satisfaction surveys and conference evaluations will be designed to support the DOL mission and function. They will cover a wide range of agency responsibilities including but not limited to pension programs, occupational safety and health programs, mine safety and

health programs, veterans programs, employment and training programs, statistical programs, and labor management standards.

Customer satisfaction surveys and conference evaluations will be used in a variety of ways, including the improvement of product delivery and services. In the absence of these services, the Department will be unable to meet the requirements of E.O. 12862.

3. The use of automation, electronic, mechanical, or other technological collection techniques

Innovative information technologies will be considered whenever possible in the execution of customer satisfaction surveys. Every possible effort will be considered to streamline each survey.

Since agencies provide different services, a single generic questionnaire could be unduly burdensome to the public and would lack the degree of specificity needed by the program office(s).

Agencies conducting customer satisfaction surveys will make use of the medium that their service relies upon where possible. For instance, an agency telephone hotline service may develop a telephone questionnaire; or, an agency that typically services mail requests for material will develop a mail-in questionnaire.

These voluntary questionnaires/evaluations will gather information from Departmental customers on subjects such as:

- the user's accessibility to the service
- the value the service has provided
- the quality and timeliness of the response/conference
- the demeanor of the agency representative that helped the user
- any additional questions or comments the respondent might have for the improvement of the service
- other undetermined customer satisfaction issues

The respondent may be asked to perform the following activities:

- a. For telephone and or face-to-face questionnaires
 - Listen to instructions
 - Provide oral responses
- b. For written questionnaire
 - Read instructions
 - Provide written responses
 - Return mail questionnaires

- c. Focus groups
 - Listen to an introduction and guidelines
 - Participate in discussions
 - Usability testing
- d. Bulletin boards
 - Read bulletin board notice
 - Provide appropriate response
- e. Internet surveys
 - Read instructions
 - Using an interactive web-based tools
 - Provide written responses
- f. Conferences
 - Read or listen to instructions
 - Provide written responses

4. Efforts to identify duplication

Customer satisfaction surveys and Conference Evaluations will not be designed to duplicate existing information. Each survey/evaluation will be assessed in accordance with DLMS 1-300 procedures to ensure that there is no duplication or overlap with other departmental programs. The data obtained from each questionnaire/evaluation will be unique, as each instrument will be tailored to a specific audience with specific questions relevant to the performance of the subject program, locality, conference topic, etc.

5. Impact on small businesses

The Department plans to minimize the burden in the following ways:

- It will allow respondents to provide information in a format convenient to them where possible, and
- It will limit the information requested to the least necessary while not compromising quality.

Collections of information conducted under this generic clearance will not impose a significant impact on small entities.

6. Consequences of less frequent collection

This question is not relevant to customer satisfaction surveys or conference evaluations, since DOL does not anticipate that individual respondents will provide information on a recurring basis. The documentation forwarded to OMB prior to administering each instrument will include

a description of the time period during which the information collection will take place and the frequency of response.

7. Explain any special circumstances

Each customer satisfaction survey will be conducted in a manner consistent with 5 CFR 1320.5. Should the need arise to deviate from the requirements outlined in 5 CFR 1320.5, individual justification will be provided to OMB on a case-by-case basis as part of the Customer Satisfaction Survey Supplemental Supporting Statement.

8. Public comment Federal Register notice and Consultation with outside representatives

No comments were received as a result of the 60-day pre-clearance Federal Register notice published on April 19, 2006 (Vol. 71, No. 75, page 20134). To date, no comments have been received.

No specific consultations were conducted outside the Department of Labor with representatives of the public. The surveys conducted under this clearance are however, by nature, attempts to consult the public with the quality and content of the work of the Department.

9. Payment or gifts to respondents other than remuneration to contractors or grantees

Respondents will not receive any payment or gifts for customer satisfaction surveys or conference evaluations.

10. Assurances of confidentiality provided to respondents and the basis

Individuals and organizations contacted will be assured of the confidentiality of their replies under 42 USC 1306, 20 CFR 401 and 422, (Freedom of Information Act), 5 USC 552a (Privacy Act of 1974), the BLS confidentiality policy, and OMB Circular No. A-130.

11. Questions of a sensitive nature

No sensitive data will be collected.

12. Burden hour estimates and annualized costs to respondents for the hour burdens

The Department currently has approximately 33 active surveys/evaluations with a total of 190,745 responses and 5,247 burden hours.

For purposes of estimating the appropriate number of reserve burden hours for this package, DOL estimates that 35 surveys/evaluations will be active in any given year¹. Based on available file data, DOL estimates an average response time of 3 to 15 minutes with an average of about 6 minutes per response.

To ensure an appropriate level of responses and hours is available for collections approved under this package, DOL estimates 200,000 annual responses and 20,000 burden hours for this iteration. Therefore, the requested burden for this generic information collection plan is calculated as follows: 200,000 responses x .10 = 20,000 hours).

DOL will submit an OMB Form 83-C (Information Change Worksheet) to adjust the burden accordingly should activity under this clearance increase beyond current projections.

With each individual survey instrument/evaluation form submitted to OMB, specific burden estimates will be provided. These estimates will include the total number of respondents, frequency of collection, average minutes/hours per response, and total burden hours and burden hour costs.

13. Total annual cost burden to respondents or record-keepers resulting from the collection

There are no start-up or annual operation and maintenance costs incurred by respondents.

14. Annualized cost to the Federal government estimates

The annualized cost to the Federal government will be included with each individual Customer Satisfaction Survey Supplemental Supporting Statement.

15. Reasons for program changes or adjustments reported in Items 13 or 14 of the OMB 83-I

No changes are in burden are requested.

16. Plans for publication

The results obtained from these various surveys will be disseminated to key policy and management officials, DOL employees, stakeholders, and the public, if applicable.

17. If seeking approval to not display the expiration date for OMB approval, explain reason(s)

¹ Most collections under this package are for one-time use and, thus, are not conducted annually.

Most customer satisfaction surveys and conference evaluations conducted under the generic clearance umbrella are one-time surveys. The Department is requesting an exemption from the requirement to print the reports clearance expiration date on its forms/surveys for one-time only surveys. All other customer satisfaction surveys will include the expiration date.

18. Exception to the certification statement identified in Item 19 of the OMB form 83-I

The DOL is not requesting an exception to the certification requirements.

B. Collection of Information Employing Statistical Methods

Statistical methods will be used for some of the collections covered under this generic clearance. When a survey uses statistical methods to select respondents, answers to questions one through five in the section of OMB's guidelines for preparing the supporting statement will be provided for that specific survey in the supplemental supporting statement for that particular survey. Agencies will work with the Bureau of Labor Statistics for each survey instrument to determine the best possible process/procedure to be followed based on the individual requirements for each customer satisfaction survey and if necessary conference evaluations.

**CUSTOMER SATISFACTION SURVEY AND CONFERENCE
EVALUATION CLEARANCE FORM**

A. SUPPLEMENTAL SUPPORTING STATEMENT

A.1. Title:	
A.2. Compliance with 5 CFR 1320.5: Yes _____ No _____	A.3. Assurances of confidentiality:
A.4. Federal cost: \$ 	A.5. Requested expiration date (Month/Year): ___/____
A.6. Burden Hour estimates: a. Number of Respondents: _____ a.1. % Received Electronically _____% b. Frequency: _____ c. Average Response Time: _____ d. Total Annual Burden Hours: _____	A7. Does the collection of information employ statistical methods? _____ No _____ Yes (Complete Section B and attach BLS review sheet).
A.8. Abstract:	
Program Official Date	Departmental Clearance Officer Date

B. SURVEYS AND EVALUATIONS EMPLOYING STATISTICAL METHODS

B.1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

B.2. Describe the procedures for the collection of information including:

- Statistical methodology for stratification and sample selection,
- Estimation procedure,
- Degree of accuracy needed for the purpose described in the justification,
- Unusual problems requiring specialized sampling procedures, and
- Any use of periodic (less frequently than annual) data collection cycles to reduce burden.

B.3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

B.4. Describe any tests of procedures or methods to be undertaken.

B.5. Provide the name, affiliation (company, agency, or organization) and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

<u>Name</u>	<u>Agency/Company/Organization</u>	<u>Number Telephone</u>

INSTRUCTIONS FOR COMPLETING CUSTOMER SATISFACTION SURVEY AND CONFERENCE EVALUATION CLEARANCE FORM

A.1. Title: Provide the title for the customer satisfaction or conference evaluation. This should be consistent with what appears on the collection instrument.

A.2. Compliance with 5 CFR 1320.5: If the survey or evaluation complies with 5 CFR 1320.5 (see below), mark an "X" next to "YES." If the survey or conference evaluation does not comply with 5 CFR 1320.5, mark an "X" next to "No" and explain any special circumstances that would cause an information collection 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, or 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 a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in 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.

A.3. Assurances of confidentiality: Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy (if applicable, otherwise omit).

A.4. Federal costs: Provide estimates of annualized cost to the Federal government. For example, this could include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. These estimates should only include expenses that would *not* have been incurred without this collection of information.

A.5. Requested expiration date: Enter the date thru which you would like approval to conduct your customer satisfaction survey and/or conference evaluation. The date entered here should be consistent with the time you need to conduct the survey/evaluation. Please note that this date cannot extend beyond the expiration date currently assigned to OMB No. 1225-0059).

A.6. Burden Hour and burden costs estimates:

a. Enter the number of respondents (i.e., number of those to which the survey or conference evaluation is addressed).

a.1. Enter the estimated percentage of responses that will be submitted electronically. This item does not apply to conference evaluations.

b. Enter the frequency for which the survey and/or conference evaluation will be conducted. For example, if the collection is conducted on an annual basis, enter “annually.” If the collection will only be conducted once then retired, enter “one-time.” If the collection is triggered by an event (such as a customer’s experience with a product or service), enter “on occasion.” Other frequencies could include: Monthly, Bi-monthly, Semi-annually, or Bi-annually.

c. Enter the average time it would reasonably take to complete the survey or conference evaluation. Average response time includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

d. Enter the total estimated annual burden hours for the collection of information. Generally, for the purposes of customer satisfaction and conference evaluations submitted under 1225-0059, this is obtained by multiplying the average response time by the number of respondents.

A.7. Does the collection of information employ statistical methods? If the collection of information does not employ statistical methods, enter a “X” next to “NO.” If statistical methods are employed, enter an “X” next to “YES” and complete Section B -SURVEYS AND EVALUATIONS EMPLOYING STATISTICAL METHODS and attach a BLS concurrent sheet signed by the BLS reviewer.

Statistical methodology involves drawing a sample from a defined population and inferring the results obtained to the population from which the sample was drawn. The important point here is inference to the population. If inferences are not being made and the results are used only internally for planning purposes, statistical methodology is not being used. However, if the results will be made public and inferences are likely to be made, proper statistical methodology is required.

Please note, BLS review should be conducted prior to submitting for Departmental review.

A.8. Abstract: Provide a statement covering the agency’s need for the information, uses to which it will be put, and a brief description of the respondents. Other than for 1-time surveys and conference evaluations, 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 (e.g., permitting electronic submission of responses).

Note: Guidance for completing Section B., Statistical Methods, is provided within the form.

**Bureau of Labor Statistics Concurrence of Customer Satisfaction Surveys
Employing Statistical Methods**

TO:	DATE:	FAX:
[Enter program sponsor contact]	____/____/____	____-____-____
FROM:		PHONE
[Enter name of BLS reviewer]		____-____-____
ACTION: Review the attached report proposal, indicate approval or disapproval and return to the Sponsoring agency or program. Comments shall not be made on the proposed report but in the comments space below.		
TITLE OF SURVEY OR EVALUATION		
CLEARANCE		
<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved (See comments below) <input type="checkbox"/> Approved with caveats (See comments below)		
COMMENTS		
Think! Privacy Act		
(Attach sheet if additional space is necessary)		
Disclaimer: BLS is approving only the statistical methodology as presented in the written documentation, and not necessarily passing judgment on the questionnaire itself nor on the necessity to conduct the collection of information.		
SIGNATURE OF BLS REVIEWER		DATE
		____/____/____

ATTACHMENT A

INVENTORY OF COLLECTIONS UNDER 1225-0059

DATE	AGENCY	DOL ID	DESCRIPTION	RESPONSES	FREQUENCY	BURDEN HOURS	STATUS	EXP. DATE
05/09/97	ESA	ESA-97-2	The Wage and Hour Division Survey of Telephone Callers	4,000	1x per customer	667	Approved	7/31/2006
10/17/97	ESA	ESA-97-4	OLMS Customer Satisfaction Survey	3,000	1x per customer	100	Approved	7/31/2006
04/03/98	ESA	ESA-98-1	OFCCP Survey of Supply and Service Contractors	413	Biannual	173	Approved	7/31/2006
01/09/99	WB	WB-99-1	Customer Comment Card	4,000	On Occasion	67	Approved	7/31/2006
04/07/99	ESA	ESA-99-3	Wage and Hour Division Survey of Participants of Educational and Outreach Events	2,135	1x per event	356	Approved	7/31/2006
08/03/99	ESA	ESA-99-4	FLSA Complainant Customer Satisfaction Survey	96	Biannual	24	Approved	7/31/2006
08/19/99	ESA	ESA-99-5	Investigated Employer Evaluation of the Wage and Hour Division (FLSA)	4,871	Biannual	12	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-2	Customer Satisfaction Survey - Participants in Training	600	Annual	150	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-3	Customer Satisfaction Survey - Phone/Fax Workers	600	Annual	150	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-4	Customer Satisfaction Survey - Stakeholders	300	Annual	300	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-5	Customer Satisfaction Survey - Employers Participating in Consultations	600	Annual	150	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-6	Customer Satisfaction Survey - Employers Who Have Been Inspected	600	Annual	150	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-7	Customer Satisfaction Survey - Employees of Inspected Employers	600	Annual	150	Approved	7/31/2006
08/14/00	OSHA	OSHA-00-8	Customer Satisfaction Survey - Employers in Voluntary Protection Programs (VPP)	566	Annual	141	Approved	7/31/2006
08/25/00	ESA	ESA-00-2	Wage and Hour Division Survey of Complaints of Employers Regarding the Family and Medical Leave Act (FMLA)	1,525	Biannual	254	Approved	7/31/2006
10/26/00	WB	WB-00-1	Evaluation Form	5,000	On Occasion	125	Approved	7/31/2006
12/06/00	DM	DM-00-1	Customer Satisfaction Survey Form	18,000	On Occasion	600	Approved	7/31/2006
03/29/01	ESA	ESA-01-1	OFCCP Survey of Construction and Supply and Service Contractors	1,595	Annual	665	Approved	7/31/2006
06/14/01	ESA	ESA-01-2	OWCP, DPEC Incoming Telephone Call Customer Service Study	2,842	1x per caller	947	Approved	7/31/2006
08/13/01	EBSA	EBSA-01-1	Focus Group evaluation of PWBA's Education Program	120	1x per customer	180	Approved	7/31/2006
08/15/01	EBSA	EBSA-01-2	EBSA Web Page Forms for Electronic Correspondence	78,000	1x per customer	650	Approved	7/31/2006
07/30/02	OSHA	OSHA-02-1	Voluntary Amputation Survey	1,036	1x	259	Approved	7/31/2006
05/02/03	WB	WB-03-1	Women's Bureau Customer Satisfaction Follow-up Survey	1,000	1x per customer	50	Approved	7/31/2006
05/08/03	EBSA	EBSA-03-1	EBSA Customer Survey Package (Omnibus)	11,352	1x per customer	704	Approved	7/31/2006
06/19/03	ESA	ESA-03-2	DFEC Telephone Provider Customer Service Survey	1,082	1x per customer	361	Approved	7/31/2006
07/18/03	OASAM/OCR	OASAM-03-1	Office of Civil Rights Conference Evaluation	400	1x per customer	20	Approved	7/31/2006
07/18/03	ODEP	ODEP-03-1	High School High / High Tech Program Customer Survey	750	Annual	676	Approved	7/31/2006
10/27/04	DM	DM-04-1	GovBenefits.gov web evaluation	15,216	1x per customer	259	Approved	7/31/2006
04/28/05	WB	WB-05-1	Women's Bureau Customer	1,767	1x per	88	Approved	7/31/2006

DATE	AGENCY	DOL ID	DESCRIPTION	RESPONSES	FREQUENCY	BURDEN HOURS	STATUS	EXP. DATE
			Satisfaction (Multiple)		customer			
08/24/05	ODEP	ODEP-05-1	JAN Survey	6,300	1x	1,346	Pending	7/31/2006
01/13/06	OASAM	OASAM-06-2	OSHA Voluntary Guidelines Surveys	1,410	1x	353	Approved	6/30/2006
06/27/06	WB	WB-06-1	Twelve Surveys to Collect Information on The Implementation and Usefulness of Four Women's Bureau Demonstration Projects	1,465	1x	244	Pending	
02/03/06	OSHA	OSHA-06-1	OSHA Training Course Evaluation	19,504	1x per customer	4,876	Approved	7/31/2006
			TOTAL:	190,745	*****	15,247	*****	*****
			ALLOCATION:	198,503	*****	9,925	*****	*****
			BALANCE:	7,758	*****	(5,322)	*****	*****

ATTACHMENT B

EXECUTIVE ORDER 12862

**PRE-CLEARANCE
FEDERAL REGISTER NOTICE**

ATTACHMENT C