

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Equal Employment Opportunity Commission (EEOC) operates a National Contact Center (NCC) in Lawrence, Kansas. The center is open Monday through Friday (except for Federal holidays), 7:00 a.m. to 7:00 p.m. Central time. The three questions will be used to continually assess customer satisfaction with the service the center provides. Callers and persons who correspond by email and web inquiries will be given the opportunity to rate the service they receive. This customer feedback will be used as part of the agency's ongoing quality monitoring of the contact center to ensure the best customer service possible.

A customer who calls the Contact Center will be given the opportunity at the end of the call to answer the customer satisfaction questions. If the caller agrees to answer the questions, s/he will be transferred to an automated system for collecting and compiling the information. An email or web correspondent will receive the questions and respond electronically. Because written and facsimile correspondence constitutes approximately 1.2% of customer contacts, no attempt will be made to survey these correspondents.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The information gathered through the surveys will be used by the EEOC to monitor the quality of customer service callers receive from the NCC. The EEOC is not currently gathering the information on a regular basis. A separate one-time customer service survey was conducted during fiscal year 2006 and the results were used as part of the decision making process to extend the NCC contract.

- 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, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

The EEOC will use technology to reduce the burden on the public. As noted earlier, a customer will be given the opportunity at the end of a call to answer the customer satisfaction questions. If the caller agrees to answer the questions, s/he will be transferred to an automated system for collecting and compiling the information. An email or web correspondent will receive the questions and respond electronically.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no current information concerning the customer service levels at the NCC. Past studies are not adequate to judge the current performance of the NCC.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The collection of information would impact small businesses or other small entities who utilize the NCC. However, because the survey is optional and consists of three questions administered through an automated system the burden on all entities is minimal.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The consequence to the EEOC would be our inability to fully gauge customer satisfaction with the performance of the NCC contractor. Without the ability to gauge customer satisfaction with the contractor's performance, the EEOC would not be able to ensure that quality customer service is being provided.

7. 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 secrets, 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.**

EEOC customers who utilize the NCC contact center will be asked to participate at the end of each contact – even if they contact the NCC more than once a quarter. However, because the

survey is optional and consists of three questions administered through an automated system the burden is minimal.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The EEOC notice was published on Thursday, September 7, 2006, on page 52791. Copy attached.

The EEOC received two public comments during the 60-day comment period. The comment from the National Partnership for Women & Families questioned whether the three questions were enough to serve as the “sole component, or perhaps even the primary component, of an accurate evaluation” of the Contact Center’s quality of service. The comment asked that the questionnaire be expanded to include more questions to provide a “significantly more precise and thorough sense of potential claimants’ experience” with the Center. The suggested additions to the questionnaire dealt with responsiveness, the type of information requested and if it was communicated clearly, answering the call in a timely fashion and was the Center able to answer the caller’s question.

The EEOC is not relying on the three questions in the customer service survey as the sole, or even the primary, indicator of Contact Center performance. However, capturing the level of customer satisfaction is important and is a factor in gauging the performance of the Center. Additionally, the Contact Center currently collects data and performance metrics that answer many of the concerns expressed in the comment, including the time to answer a call and the type of information requested by a caller. Further, the EEOC regularly monitors calls on a live and recorded basis to ensure the accuracy and quality of the information provided by the Center. Therefore, we believe that the customer survey is adequate for its intended purpose.

The comment from the National Councils of EEOC Locals No. 216 begins by stating their long-standing opposition to the EEOC’s Contact Center. The comment goes on to state that the survey is not a good indicator of performance because it merely gathers data on customer perception and not about the quality of service. As discussed above, the survey is not the sole indicator used to judge the performance of the Contact Center, but is an important factor. The comment then states that the notice does not provide enough information about the methodology

and the assumptions behind the survey. Those criticisms are clearly answered with this notice. The comment notes that the focus should be on the accuracy of the information the NCC provides to callers. We agree and point to the extensive monitoring of NCC contacts discussed above. Finally, the comment notes that the survey is too short and puts forth an alternative set of 12 questions not suited for use on the IVR.

EEOC consulted with Pearson Government Systems, the National Contact Center contractor, concerning the expected response rate and the hour burden for individual calls.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

There will be no gifts or payments to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There is not an assurance of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

EEOC is not seeking to collect data of a sensitive nature. The three optional questions deal exclusively with customer service.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate**

categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

Over the past six months, the NCC has averaged approximately 51,000 contacts from the public each month via phone, email, fax and written correspondence. Phone contacts alone have averaged about 42,000 monthly for the past six months. Because the survey is voluntary there is no way to accurately predict the number of users who will agree to take the survey. The contractor estimates that, based on its experience with similar surveys the response rate will be between 25% and 35%. The contractor also estimates that if the respondent does not need to have the satisfaction questions repeated and responds immediately after hearing the complete response, the survey will take approximately 1 minute 43 seconds to administer. The burden is estimated at 5,722 hours. We estimated 200,000 annual surveys completed at 1 minute and 43 second per survey. There is no annualized cost to respondents.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There will be no burden on respondent record keepers resulting from the collection of this information.

- 14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should 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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

There are no additional costs to the Federal government.

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**
- 16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

The results of the survey will be tabulated on a monthly basis. There are no plans to publish this data, although some of the data may be used in other reports when relevant. The results will be included with other information gathered from the NCC.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

A significant majority of the surveys would be administered through an automated telephone response system. The OMB expiration date will appear on the web-based questions

- 18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.**

G (vi) requires that the respondent be informed of the OMB control number. The control number will not be stated on the automated phone survey, but will be present on the computerized survey questionnaires.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

- 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.**

The potential respondent universe consists of those who contact the EEOC's NCC and speak to a Customer Service Representative. Over the past 6 months there were on average approximately 51,000 contacts made each month at the NCC. The expected response rate is between 25% and 35%. During a customer satisfaction survey conducted in February 2006, 150 telephone interviews were conducted, but no acceptance rate was reported.

- 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 frequent than annual) data collection cycles to reduce burden.**

A customer who calls the Contact Center will be given the opportunity at the end of the call to answer the customer satisfaction questions. If the caller agrees to answer the questions, s/he will be transferred to an automated system for collecting and compiling the information. An email or web correspondent will receive the questions and respond electronically. Because written and facsimile correspondence constitutes approximately 1.2% of customer contacts, no attempt will be made to survey these correspondents. There are three questions on the survey.

- 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.**

Efforts to maximize response rates focused on using technology to make taking the survey easier as well as keeping the survey brief to reduce the burden.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.**

Because the survey is brief and the burden is minimal we did not test the survey.

- 5. Provide the name 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.**

No one was consulted on statistical aspects of the design. Information will be collected by Pearson Government Solutions, the contractor that operates the EEOC NCC. The information will be analyzed by Field Management Programs in the Office of Field Programs of the EEOC.