

SUPPORTING STATEMENT
U.S. Department of Commerce
National Institute of Standards and Technology
Generic Clearance for Usability Data Collections
OMB CONTROL NO. 0693-0043

A. JUSTIFICATION

This is a request to extend the Office of Management and Budget (OMB) approval.

1. Explain the circumstances that make the collection of information necessary.

In accordance with OMB's regulations at 5 CFR 1320 implementing the Paperwork Reduction Act, the Government Performance and Results Act of 1993, Executive Order 12862 – Setting Customer Service Standards, the National Performance Review, good management practices, and its mission

“To strength the U.S. economy and improve the quality of life by working with industry to develop and apply technology, measurement, and standards”

the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce, proposes to conduct a number of usability data collections.

These surveys, both quantitative and qualitative are designed to determine requirements and evaluate usability and utility of NIST research for measurement and standardization work.

These types of data collection efforts may include, but may not be limited to electronic methodologies, empirical studies, video and audio data collections, interviews, and questionnaires. An example of data collection efforts may include evaluations of software for use by the intelligence community as well as evaluations of other types of interactive systems and the usability of NIST information products. Additional data collection efforts may be conducted in the future by other scientific and technical areas at NIST under this generic clearance request.

An example of a previously approved data collection: NIST collected information from adult volunteers with normal correctable vision (recruited from NIST employees, participants in the Moving Picture Experts Group (MPEG), and members of collaborating organizations and businesses). This group had the visual acuity and color vision to judge picture quality and also had a high level of interest in volunteering for the assessment. The goal was to assess moving picture quality, quantify the differences in compression efficiency, and measure the significance of subjective differences between various candidate technologies.

NIST will limit its inquiries to data collections that solicit strictly voluntary opinions and information, and will not – under this PRA clearance request – collect information that is required or regulated.

For each proposed request using the generic clearance, NIST will submit the actual instrument to OMB along with responses to the following questions:

- 1. Explain who will be surveyed and why the group is appropriate to survey.**
- 2. Explain how the survey was developed including consultation with interested parties, pre-testing, and responses to suggestions for improvement.**
- 3. Explain how the survey will be conducted, how customers will be sampled if fewer than all customers will be surveyed, expected response rate, and actions your agency plans to take to improve the response rate.**
- 4. Describe how the results of the survey will be analyzed and used to generalize the results to the entire customer population.**

Samples of previously-approved surveys are listed in ROCIS.

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

The data collected by NIST researchers will be used to help plan the direction of future research. The information will not be disseminated to the public but will be used to support research published in journals and conferences. There will be no attribution to individuals in the analyzed data. Data collection efforts will be approved by the NIST Institutional Review Board as well.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.

Whenever possible, improved information technology will be used to reduce burden on NIST's customers. In addition to traditional data collection methods, NIST will, whenever possible, offer electronic response via the NIST website and by fax.

The planned use of transactional and electronic web site surveys will substantially contribute to the number of projected responses and associated burden hours.

4. Describe efforts to identify duplication.

NIST has an internal review process that will examine each survey or data collection effort to be conducted under the generic clearance – to prevent internal duplication of effort and to ensure that appropriate data collection instruments used are developed. By examining the three-year, NIST-wide requirements and combining those requirements into a generic clearance request, NIST is, to the greatest extent possible, centralizing the administration of its customer’s data collections. This will provide for a more consistent and comprehensive approach. While there may be other surveys or data collections that become the subject of separate clearance requests, NIST is confident that the procedures in place ensure that there will be no duplication. Due the nature of NIST’s unique mission and programs to further, no similar data exists.

Individuals participating in these data collection efforts will be asked to sign informed consent documents (meaning participants are informed of the data collection and give their consent to participate) and no individual will be surveyed more than once for the same research study.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

Some small businesses and other small entities may be involved in these efforts, but NIST will keep the burden to them-as well as on any business, organization, or individual-at a minimum by asking for only the minimum amount of information needed to evaluate usability and utility of NIST research for measurement and standardization work.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If these surveys and other data collections were conducted less frequently or not conducted, NIST research will be significantly less effective.

In addition, the Government Performance and Results Act of 1993, Executive Order 12862 - Setting Customer Service Standards, the National Performance Review, and good management practices set the policy and performance precedents that warrant and encourage such data collections.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The data collection conducted under this generic clearance will be conducted in accordance with the guidelines in 5 CFR 1320.05.

8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the 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.

A Federal Register Notice soliciting public comment was published on Wednesday, April 8, 2009 (Vol. 74, No. 66, pg. 15939). No comments were received.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

NIST will not provide any payment or gift to respondents to any written, telephone, comment card, or other such survey. However, if respondents must leave their home or place of business to travel to a specific location, NIST will, on a case-by-case basis, consider a modest remuneration for the participant's travel expenses. In such cases, the remuneration will range from \$20-\$40 per individual. For focus groups, where NIST has requested the voluntary participation of professional individuals, a remuneration may be offered (\$50-60).

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

Individuals will be assured of confidentiality and will be given notice of this via an informed consent document approved by the NIST Institutional Review Board. All information collected will be stored anonymously without identifiers. There will be no attribution to individuals in the analyzed data. The Code of Federal Regulations Title 15, Part 27, Protection of Human Subjects, describes the general requirements for informed consent.

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.

Not Applicable.

12. Provide an estimate in hours of the burden of the collection of information.

The estimated burden hours are 1,000, collectively. For example, each effort may have a potential respondent universe of 200 with a maximum of time to complete a survey to be approximately 30 minutes.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

No costs for the respondent would be incurred.

14. Provide estimates of annualized cost to the Federal government.

It is difficult to estimate the costs in advance. The availability of funds and staff resources will impact NIST's ability to conduct all the proposed activities. Consequently, it is uncertain of the number of activities that will be undertaken. Most of the surveys will be conducted and analyzed using in-house resources, though NIST may contract some of the surveys to be conducted.

15. Explain the reasons for any program changes or adjustments.

Not Applicable.

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

Data will be used in papers published in research journals and in providing evidence for usability guidelines or standards.

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

All written and electronic material will display the expiration date for the OMB approval of the information collection.

18. Explain each exception to the certification statement.

Not Applicable.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

Collections will not employ statistical methods.