SUPPORTING STATEMENT U.S. Department of Commerce National Institute of Standards and Technology Generic Clearance for Program Evaluation Data Collections OMB CONTROL NO. 0693-0033

A. JUSTIFICATION

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

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 strengthen the U.S. economy and improve the quality of life by working with industry to develop and apply technology, measurements, and standards"

the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce (DOC), proposes to conduct a number of data collections under this Generic Clearance for Program Evaluation Data. This data will assist NIST in improving the programs' processes and services to its customers.

These types of data collection efforts may include but are not limited to electronic methodologies, empharical studies, video and audio data collections, interviews, and questionnaires.

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 of 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 will be analyzed and used to generalize the results to the entire customer population.

Samples of previously-approved data collections are in ROCIS.

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

In general, the data collected by NIST will be used to help plan the direction of future research in a variety of activities. The information collected will not be disseminated to the public but will be used to support research published in journals and conferences. All information collected will be stored anonymously and there will be no attribution to individuals in the analyzed data.

This information collection and dissemination will comply with the NIST Chief Information Officer (CIO) Information Quality Guidelines and Standards.

3. <u>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</u>.

Wherever 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 Internet web site 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 established 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 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 program evaluation 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 of effort. Due to the nature of NIST's unique mission and programs to further the mission, no similar data exists.

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

Some small businesses or other small entities may be involved in these efforts, but NIST will keep the burden to them, as well as on any other business, organization, or individual at a minimum by asking for only the minimum information needed to evaluate programs on a strictly voluntary basis.

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

If these surveys and other data collections were collected less frequently, NIST will be unable to gauge the programs for present and future use. If the collections were not conducted, the following would not be possible: (1) the results from these data collections may lead to further investigations that could result in changes to, or enhancements of, the administration of programs, as well as identifying high-priority items for improvement; (2) the collection of economic data that will shed light on the productivity of NIST programs and their role in achieving NIST's mission. There is no technical or legal obstacle to reducing this burden.

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. <u>Explain any special circumstances that require the collection to be conducted in a</u> <u>manner inconsistent with OMB guidelines</u>.

The data collection conducted under this generic clearance will be conducted in accordance with the guidelines in 5 CFR 1320.5.

8. <u>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</u>

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.

No comments were received as a result of the publication of the Federal Register Notice, Vol. 74, No. 66, pg. 15939 on Wednesday, April 8, 2009.

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

NIST will provide no payment or gift to respondents to any written, telephone, comment card, or other such survey. For focus groups professionally conducted by a contractor, NIST will, on a case-by-case basis, consider modest remuneration for the participant's time and travel. In such cases, the remuneration will range from \$50-\$75 per individual. Remuneration for focus group participation is a recognized and standard industry practice, without which it would be difficult to achieve appropriate and adequate participation and response and to obtain reliable information.

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

No assurances of confidentiality will be given.

11. <u>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</u>.

No sensitive data will be collected.

12. <u>Provide an estimate in hours of the burden of the collection of information</u>.

The request for the annual burden hours for the three-year period is 3,022.

13. <u>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)</u>.

There are no known costs to the respondents.

14. <u>Provide estimates of annualized cost to the Federal government</u>.

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 has intent to contract some of the surveys to be conducted.

15. <u>Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I</u>.

Not Applicable.

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

The data collections will be used in statistical analysis or for descriptive analysis when qualitative data is collected. There will be no attribution to individuals. Data will be used in papers published in research journals and in providing evidence for usability guidelines or standards.

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

All written and electronic material will display the expiration date for the OMB approval of the information collection. All written and electronic surveys (with the exception of transactional surveys in the form of business reply cards where space will not permit) will also display the following notification:

'This survey is authorized under Executive Order 12862, "Setting Customer Service Standards." Your response is voluntary and all data collected will be considered confidential. Public reporting for this collection of information is estimated to average ______ (insert time) minutes per response, including the time of reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Notwithstanding any other provision of law, no person is required to respond to, nor shall a person be subject to a penalty for failure to comply with, a collection of information subject to the requirements of the Paperwork Reduction Act unless that collection of information displays a currently valid OMB control number. Send comments regarding this estimate or any other aspects of this collection of information, including suggestions for reducing the length of

this questionnaire, to the National Institute of Standards and Technology, Attn. Darla Yonder, 100 Bureau Drive, Stop 1710, Gaithersburg, MD, 20899-1710 and the Office of Management and Budget, Office of Information and Regulatory Affairs, Washington, DC 20503.'

18. <u>Explain each exception to the certification statement identified in Item 19 of the OMB 83-I</u>.

NIST does not require any exceptions.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

No statistical methods will be used for these information collections.