

**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 (hereinafter 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 June 2, 2009 (Vol. 74, Fed. Reg. 26426). 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 35 active surveys/evaluations with a total of 202,066 responses and 14,708 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 a non-substantive change 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.