

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL
UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR PART 1320**

AGENCY: Pension Benefit Guaranty Corporation

TITLE: Customer Service Focus Groups and Surveys

STATUS: Request for Extension of Approval of Collection of Information

CONTACT: Thomas H. Gabriel (202) 326-4223 x3898

A. Justification.

1. Need for collection. Executive Order 12862, *Setting Customer Service Standards*, states the Federal Government must be customer driven. Agencies that provide significant services directly to the public must seek to provide “the highest quality of service delivered to customers by private organizations providing a comparable or analogous service.” The Pension Benefit Guaranty Corporation (“PBGC”) requests that the Office of Management and Budget (“OMB”) approve an extension of a generic collection of information, OMB No. 1212 0053 (expires 12/31/2009), consisting of customer satisfaction focus groups and surveys.

PBGC will consult with OMB regarding each specific information collection during the approval period. For individual surveys or focus groups, PBGC shall submit a generic clearance request in ROCIS along with (a) the proposed instruments (focus group scripts and survey questions), and (b) an abbreviated supporting statement in the template agreed to by OMB and PBGC. The statement shall include all relevant information, including a statement of need, intended use of information, description of respondents, information collection procedures, expected response rate, description and justification for any incentive provided to respondents, and estimated burden incurred by respondents.

PBGC uses customer satisfaction focus groups and surveys to find out about the needs and expectations of its customers and to assess how well it is meeting those needs and expectations. By keeping these avenues of communication open, PBGC can continually improve service to its customers, including plan participants and beneficiaries, plan sponsors and their affiliates, plan administrators, pension practitioners, and others involved in the establishment, operation and termination of plans covered by PBGC's insurance program. Because the areas of concern to PBGC and its customers vary and may quickly change, it is important that PBGC have the ability to evaluate customer concerns quickly by developing new vehicles for gathering information under this generic approval.

The focus groups and surveys will provide important information on customer attitudes about the delivery and quality of agency services and will be used as part of an ongoing process to improve PBGC programs. PBGC's designated paperwork officer will be responsible for ensuring that individual collection applications are consistent with the Paperwork Reduction Act, implementing regulations, and the terms of the generic clearance.

The customer surveys and focus groups may gather information addressing subjects such as:

- access to services,
- the value of the service to recipients,
- the quality and timeliness of the service, and
- changes that might help improve service.

Respondents may be asked to perform activities such as:

For surveys:

- o reading or listening to the instructions,
- o responding to questionnaire or interview questions, and
- o returning completed surveys to PBGC.

For focus groups:

- o listening to description of group's purpose and guidelines for group's operation, and
- o participating in discussions of specific customer service topics.

2. Use of Information. PBGC will use the generic clearance to collect customer satisfaction data (via surveys, focus groups or software usability testing sessions) where PBGC seeks to gather information for general service improvement, not for publication or for the purpose of informing significant policy or resource allocation decisions. PBGC may consider customer satisfaction data among other relevant factors in formulating policy or allocating resources.

3. Reducing the burden. PBGC will attempt to minimize the burden of this voluntary collection by requiring only the information necessary to achieve its objectives. In general, it is expected that each respondent will be asked to attend only one focus group or complete one survey. However, several focus groups may be conducted on the same subject in order to get a true representation of the customer universe. PBGC will evaluate, on a continuing basis, whether, and to what extent, a particular collection of information under this generic approval may make appropriate use of automated, electronic, mechanical, or other forms of information technology to gather information, e.g., permitting electronic submission of responses to reduce the burden on respondents.

PBGC will identify any such proposed use when requesting OMB approval under the generic procedures.

4. Duplicate or similar information. No similar data are gathered or maintained by any State or Federal agencies or other sources known to PBGC.

5. Reducing the burden on small entities. Inapplicable.

6. Consequence of reduced collection. The requested collections are the minimal number of collections necessary to meet the high service standards established by E.O. 12862. Any reduced or less frequent collections would interfere with PBGC's ability to identify the need for improvements in its functions and services and to respond to customer concerns.

7. Consistency with guidelines. This collection is being conducted in accordance with established guidelines.

8. Outside input. PBGC invited public comment on the proposed information collection. 74 Fed. Reg. 40244 (August 11, 2009). No comments were received in response to the notice. PBGC is again seeking public comment. 74 Fed. Reg. 62357 (November 27, 2009). PBGC periodically seeks outside review of its survey methodology and major collection instruments. PBGC has also used focus groups to obtain respondents' views on alternative ways of collecting information on matters relating to customer service.

9. Payments or Gifts. PBGC's success in designing and conducting effective and reliable surveys and focus groups ultimately depends in large part on response rates to surveys and attendance rates at focus groups. Given the substantial resources that may be invested in these collection instruments and the potential impact of decisions using data

from the collection, PBGC may need to incur costs to ensure an adequate and appropriate incentive for respondents to complete surveys and for individuals to attend focus groups. A focus group stipend may also reflect the cost of transportation or parking, and focus group participants may be provided light refreshments. PBGC will describe any such planned expenditure when consulting with OMB regarding each specific information collection during the approval period.

10. Confidentiality. Confidentiality of information is that afforded by the Freedom of Information Act and the Privacy Act. PBGC's rules that provide and restrict access to its records are set forth in 29 CFR Parts 4901 and 4902.

11. Sensitive Questions. This collection of information does not call for submission of information of a sensitive or private nature.

12. Burden on the public. PBGC estimates that the annual burden for this collection of information will total not more than 710 hours for 2,000 respondents. This represents a decrease of 690 burden hours (from 1,400) and 2,200 respondents (from 4,200) from the annual burdens currently approved by OMB.

PBGC further estimates that the cost to respondents per burden hour will average \$72, resulting in a total cost of \$51,120 ($\72×710). This average reflects the variation in wage rates assigned to burden hours for various respondents based on differences in respondents' characteristics. For example, some respondents will be professionals (such as actuaries, accountants, and attorneys) who command high hourly rates while others will be retirees who are not working. PBGC will provide specific burden estimates when requesting OMB approval under the generic procedures.

13. Costs. No capital or annual costs will be incurred by respondents in this information collection.

14. Cost to the Federal government. PBGC will provide specific cost estimates when requesting OMB approval under the generic procedures.

15. Program Change. The decrease in the estimated annual burden is due to PBGC's revised estimates of the potential number of respondents. The decrease in the cost estimate reflects this decrease in the burden estimate, offset by a slight increase in the estimated cost per hour.

16. Publication. See item 2, above, "Use of Information".

17. Display of Expiration Dates. PBGC will display the expiration date for OMB approval of the information collection.

18. Exceptions to Certification Statement. There are no exceptions to the certification statement.