

**Office of the Comptroller of the Currency**  
**Supporting Statement**  
**Generic Information Collection**  
**Qualitative Feedback on OCC Service Delivery**

**A. JUSTIFICATION**

**1. Circumstances Making the Collection of Information Necessary**

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Office of the Comptroller of the Currency (OCC) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. Qualitative feedback is information that provides useful insights on perceptions and opinions, but does not include statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the OCC to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving delivery of services. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the OCC's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, and/or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative, and actionable communications between the OCC and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

**2. Purpose and Use of the Information Collection**

Improving OCC programs requires ongoing assessment of service delivery, by which we mean the systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The OCC will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and to make improvements in service delivery based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. The information in the responses will be used to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers and stakeholders on the OCC's services will be unavailable.

The OCC will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the OCC (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions <sup>1</sup>;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are able to be generalized to the population of study ;
- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial and do not raise issues of concern to other Federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the OCC will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation, including a copy of the instrument. The submission will have automatic approval, unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Customer comment cards/complaint forms
- Small discussion groups
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

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<sup>1</sup> As defined in OMB Information Quality Guidelines, “influential” means that “an Agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

The OCC has established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

### **3. Consideration Given to Information Technology**

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

### **4. Duplication of Information**

No similar data are gathered or maintained by the OCC or are available from other sources known to the OCC.

### **5. Reducing the Burden on Small Entities**

Small business or other small entities may be involved in these efforts but the OCC will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

### **6. Consequences of Not Conducting Collection**

Without these types of feedback, the OCC will not have timely information to adjust its services to meet customer needs.

### **7. Special Circumstances**

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

### **8. Consultations with Persons Outside the OCC**

On December 22, 2010, and April 18, 2011, 30-day and 60-day notices for public comment were published in the *Federal Register*. No comments were received. 75 FR 80542; 76 FR 21800.

### **9. Payment or Gift**

The OCC will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups are the exceptions.

In the case of in-person usability studies, the OCC may provide stipends of up to \$40. In the case of in-person focus groups, the OCC may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely, via phone, or Internet, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-

person studies, who have to travel to the OCC or other facility to participate. If such information collections include hard-to-reach groups and the OCC plans to offer non-standard stipends, the OCC will provide OMB with additional justifications in the request for clearance of these specific activities.

**10. Confidentiality**

If a confidentiality pledge is deemed useful and feasible, the OCC will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the OCC includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

**11. Sensitive Nature**

No questions will be asked that are of a personal or sensitive nature.

**12. Burden of Information Collection**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (1,600) are based on the number of collections we expect to conduct over the requested period for this clearance.

<b>Estimated Annual Reporting Burden</b>				
<b>Type of Collection</b>	<b>No. of Respondents</b>	<b>Annual Frequency per Response</b>	<b>Hours per Response</b>	<b>Total Hours</b>
Feedback on OCC Issuances	3,000	1	.25	750
Focus Groups	25	1	4	100
Usability Testing	3,000	1	.25	750
<b>Total Burden</b>				<b>1,600</b>

**13. Costs to Respondents**

No costs are anticipated.

#### **14. Costs to Federal Government**

The anticipated annual cost to the Federal government is minimal. There is no identifiable increase in OCC's current operational expenses due to under this collection.

#### **15. Reason for Change**

Not applicable. This is a new request for a generic ICR.

#### **16. Tabulation of Results, Schedule, Analysis Plans**

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general service improvement, but are not for publication or other public release.

Although the OCC does not intend to publish its findings, the OCC may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The OCC will disseminate the findings when appropriate, strictly following all applicable statutes, rules, and guidelines.

#### **17. Display of OMB Approval Date**

We are requesting no exemption.

#### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

These activities comply with the requirements in 5 CFR 1320.9.