

Supporting Statement – Part A

Supporting Statement For Paperwork Reduction Act Submissions

A. Background

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 U.S. Department of Health and Human Services (hereafter "the Agency") seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. By qualitative feedback we mean information that provides useful insights on perceptions and opinions, but are not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, 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 Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

Collecting voluntary customer feedback is the least burdensome, most effective way for the Agency to determine whether or not its public websites are useful to and used by its customers. Generic clearance is needed to ensure that the Agency can continuously improve its websites through regular surveys developed from these pre-defined questions.

Surveying the Agency websites on a regular, ongoing basis will help ensure that users have an effective, efficient, and satisfying experience on any of the websites, maximizing the impact of the information and resulting in optimum benefit for the public. The surveys will ensure that this communication channel meets customer and partner priorities, builds the Agency's brands, and contributes to the Agency's health and human services impact goals.

The Agency employees, full-time contractors, or contract vendors will collect the data for these surveys. The data collected will include background participant information that does not identify individuals, task identification, and overall satisfaction measures. The data will

be collected electronically and stored digitally on a secure site or computer.

B. Justification

1 . Need and Legal Basis

Improving agency programs requires ongoing assessment of service delivery, by which we mean 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 Agency will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and 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. Responses will be assessed 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 Agency's services will be unavailable.

The Agency 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 agency;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions ¹;
- 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 generalizable 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.

¹ As defined in OMB and agency 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."

If these conditions are not met, the Agency 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 (e.g., a copy of the comment card). 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)

The Agency 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.

2. Information Users

Primary objectives are to determine whether the Agency's websites:

- (1) Meet the wants, preferences, and needs of its target audiences.
- (2) Are effective vehicles for sending messages to target audiences.
- (3) Deliver existing services at a satisfying level of quality.
- (4) Provide users with the kind and quality of services they need.

Findings have helped and will continue to help the Agency to:

- (1) Understand the user community and how to better serve HHS website users.
- (2) Identify areas of the website requiring improvement in either content or delivery.
- (3) Determine the kind and quality of services our target audiences need.
- (4) Determine how to align Web offerings with identified user need(s).
- (5) Explore new or refined methods for offering, presenting and delivering information most effectively, to enable us to present messages as well as serve the needs of people who are already coming to seek particular information or to learn about a particular topic.

The data collected from this effort will allow us to answer critical usability questions, including:

- What are the Web needs and preferences for our target audiences?
- How often and for what purposes (there can be several simultaneously) do our target audiences typically use the Agency’s websites?
- How satisfied are they with their experience on the Agency’s websites?
- What difficulties do they experience when trying to complete typical tasks on Agency’s websites?
- In what ways can we improve their speed and ability to find the information they want, expect or need on the Agency’s websites?
- Were messages on the site presented in such a way that they are noticeable, easy to understand, easy to remember, and have an impact on the viewer’s behavior plans?
- How does their awareness of, knowledge of, and opinions on a health topic change after viewing the Agency’s websites?
- Did they find information/messages about health and human service issues they were not initially looking for when viewing information on the site? Did the message have an effect, e.g. change their behavior plans?
- Are they satisfied with the services offered through the Agency’s websites?
- What improvements would the user like to see made to the existing services on the Agency’s websites?
- What other services do they need?

The survey will help ensure that the Agency’s websites meet site visitor and agency needs, build the Agency’s brands, and contribute to health and human service impact goals. Feedback from the user base is necessary to fully judge the performance of the Agency’s websites. All data collected through the survey will be used to determine whether HHS should revise content, labels, structure, or layout of its Web pages. If indicated, revisions would be intended to increase the success rate of information-seeking website visitors.

3. Use of Information Technology

All data will be collected electronically to reduce the burden to the respondent.

For most questions in the survey, the respondent will click on a “radio button” or checkbox that corresponds to their response. For open-ended questions in usability surveys, the respondent would be told to enter their answer in the provided text box. We have attempted to keep the format of the survey simple with short questions and clearly labeled and scaled answer choice-sets.

We will keep the survey short, with no more than 12 questions at any one time, including no more than two open-ended questions.

4. Duplication of Efforts

No similar data are gathered or maintained by the Agency or are available from other sources

known to the Agency.

5. Small Businesses

There is no burden on small businesses or small entities.

6. Less Frequent Collection

There are a number of potential negative consequences if these data are not collected. In addition, if the collection is not conducted frequently, we will not have valuable data needed to routinely revise messages and reorganize online health information in a way that is most easily understood and accessed by website visitors. Specifically, without this data there would be:

- No performance measures by which to determine effectiveness of the Agency's websites as a tool for our visitors and message channels for the department. This results in lowered user satisfaction, fewer return visits, and decreased information dissemination.
- No user data to include in website design decision-making to ensure that user experience on our site is efficient, effective, and enjoyable. This results in an unfocused approach to Web design in which we are unable to determine whether our site is useful or not.
- Vital feedback regarding customer and/or partner satisfaction with various aspects of the HHS's services will be unavailable.

Usability surveys will only be conducted at intervals considered appropriate to measure the impact of HHS website changes and to monitor the level of performance. We are only expecting one-time responses from respondents. Therefore, it is not possible to ask participants to fill out the survey less frequently. Page-level usability surveys will be available as long as the page is available to the public. Similarly, we expect one-time responses from respondents.

7. Special Circumstances

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

8. Federal Register/Outside Consultation

In accordance with 5 CFR 1320.8(d), December 22, 2010, a 60-day notice for public comment was published in the *Federal Register*.

9. Payments/Gifts to Respondents

There will be no payments or gifts to respondents.

10. Confidentiality

All participants will be informed at the beginning of the survey that their responses will be treated in a secure manner, that all data will be safeguarded closely, and that no individual identifiers are planned to be used in survey reports.

All data will be stored in secured electronic files for at least two years and no longer than 10 years.

11. Sensitive Questions

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

12. Burden Estimates (Hours & Wages)

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (670,000) are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Website Customer Satisfaction Survey	1,000,000	At least one-time	4/60	67,000

13. Capital Costs

No costs are anticipated.

14. Cost to Federal Government

The anticipated cost to the Federal Government is approximately \$250,000 annually. These costs are comprised of: instrument preparation, implementation and analysis; survey preparation, conduction and analysis; and manager survey review.

Usability surveys will be prepared by contractors or Agency staff (FTE). An FTE manager will review all surveys. Usability teams will vary across HHS web teams but typically an FTE and contractor will work together on survey preparations, coding the surveys electronically, conducting the surveys, and analyzing of data. Additionally, a senior-level FTE will typically

review and approve the activities. The amount of time staff and contractors spend on surveys will vary depending on the number of participants for each survey, the number of questions, and the site being surveyed. An average number of 400 web page survey sites a year were assumed for estimation purposes. Overall time spent by Agency staff and contractors is lessened as this package provides tasks and questions to be used in the survey; thus, reducing time staff normally would have spent developing these questions.

Staff or Contractor	Average Hours per Study	Average Hourly Rate	Average Cost
Contractor instrument preparation, conduction, analysis (GS-12/GS-13 equivalent)	3	\$36.00	\$108.00
FTE survey preparation, conduction, analysis (GS-13)	10	\$39.00	\$390.00
FTE manager survey review (GS-14)	1	\$45.00	\$45.00
AVERAGE COST PER SURVEY			\$543.00
AVERAGE 1-YEAR COST			\$217,200.00

15. Changes to Burden

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

16. Publication/Tabulation Dates

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 Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public.", and will include specific discussion of the limitation of the qualitative results discussed above.

17. Expiration Date

We are requesting no exemption.

18. Certification Statement

These activities comply with the requirements in 5 CFR 1320.9.