SUPPORTING STATEMENT A:

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NCI)

OMB Number: 0925-0642, Expiration Date: 09/30/2014

This is an extension to the original submission and all changes throughout this document are in yellow highlight.

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1. Sub-Study Template Submission Form
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A. JUSTIFICATION

This is an extension to the previously approved submission. There are no changes being requested for this submission. The information collection activity has garnered qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with the Administration's commitment to improving service delivery. This generic has provided information about the National Cancer Institute's 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. It has also allowed feedback to contribute directly to the improvement of program management. Feedback collected under this generic clearance provides useful information but it does not yield data that can be generalized to the overall population.

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, Department of Health and Human Services (DHHS), National Institutes of Health (NIH), National Cancer Center (NCI), (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 helps to ensure that users have an effective, efficient, and satisfying experience with the agency's programs. This feedback provides 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 allow for ongoing, collaborative and actionable communications between the agency and its customers and stakeholders. It also allows feedback to contribute directly to the improvement of program management. This generic clearance is imperative to providing a vehicle for speedily reviews of simple information collections. For this reason this information collection needs to continue.

2. Purpose and Use of the Information Collection

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 has collected, analyzed, and interpreted 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 targets areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses are assessed to plan and inform efforts to improve or maintain the quality of service offered to the public (see Attachment 1). If this information is not collected, vital feedback from customers and stakeholders on the agency's services will be unavailable.

The agency only submits 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 DHHS (if released, procedures outlined in Question 16 wil be followed);
- 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 agency;
- 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 renumeration 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 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)

There have been 37 projects approved under this generic clearance since its approval three years ago, all contributing significantly to the mission of NCI. These projects have ranged from website usability testing to meeting and customer satisfaction surveys. Attachment 2 provides a list of the information collections (sub-studies) that have been previously approved in the past three years.

[1] As defined in OMB and DHHS, "Guidelines for Ensuring the Quality of Information Disseminated to the Public," “influential” means that 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 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.

3. Consideration Given to Information Technology

If appropriate, agency 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 agency or are available from other sources known to the agency.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but the agency minimizes 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 agency will not have timely information to adjust its services to meet customer needs.

7. Special Circumstances

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

8. Consultations with Persons Outside the Agency

In accordance with 5 CFR 1320.8(d), on March 18, 2014 (79 FR 15133) a 60-day notice for public comment was published in the *Federal Register*. There were no public comments received.

9. Payment or Gift

The agency does not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the agency may provide stipends of up to $40. In the case of in-person focus groups, the agency 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 agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the agency 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 agency 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 agency for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Sensitive Nature

No questions are 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 total annual burden hours requested (8,750) are based on the number of collections we expect to conduct over the next three years. This request in burden hours has not changed from the previously approved submission.

Table. A.12-1 Estimated Annual Reporting Burden

Type of Collection	Number of Respondents	Number of Responses per Respondent	Average Burden Per Response (in hours)	Total Burden Hours
Surveys	1000	1	30/60	500
In-Depth Interviews (IDIs) or Small Discussion Groups	500	1	90/60	750
Focus Groups	2000	1	90/60	3,000
Website or Software Usability Tests	3000	1	90/60	4,500
Total	6,500			8,750

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately $300,000 annually. These costs are comprised of: operational expenses (e.g., equipment, overhead, printing, postage and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance.

15. Reason for Change

This is an extension of a currently approved submission. There are no changes to this submission from the previously, approved submission. Additionally, there are no changes in the burden being requested.

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 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 DHHS'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. 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.