

**Supporting Statement for Paperwork Reduction Act Generic Information Collection
Submissions for
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service
Delivery”**

A. JUSTIFICATION

1. Need for the Collection of Information

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, Pension Benefit Guaranty Corporation (“PBGC”) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on its service delivery. By qualitative feedback we mean information that provides useful insights on the public’s perceptions and opinions. However, because the results obtained are not from statistical surveys, they are not quantitative results that can be generalized to the population of interest.

This collection of information is necessary to enable PBGC to obtain 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 PBGC’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 the delivery of products or services or enhance their utility. These collections will allow for ongoing, collaborative and actionable communications between PBGC 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 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 and quality based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy and comprehensiveness of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to improve or maintain the quality of services offered to the public. If this information is not collected, vital feedback from customers and stakeholders on PBGC’s services will be unavailable.

PBGC 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 PBGC (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;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 interest;
- 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 beyond the end of the study.
- It informs respondents of the information called for under 5 CFR 1320.8(b)(3).

If these conditions are not met, PBGC 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)

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.”

PBGC 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. Reducing the burden and information technology

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

4. Identifying Duplication of Information

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

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but PBGC 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, PBGC will not have timely or adequate information to adjust its services to better 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 or for the purpose of substantially informing influential policy decisions.

8. Outside Input

In accordance with 5 CFR 1320.8(d), PBGC published a 60-day notice on April 11, 2014, 79 Fed. Reg. 20248. No public comments were received in response to the 60-day notice. PBGC published a 30-day notice on June 27, 2014, 79 Fed. Reg. 36563.

9. Payment or Gift

PBGC will 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 for in-person studies where respondents have to travel to an agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, PBGC 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, PBGC will only include a pledge of confidentiality that is (a) supported by authority established in statute or regulation, (b) supported by disclosure and data security policies consistent with the pledge, and (c) does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If PBGC includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Sensitive Nature

This collection of information does not call for submission of information of a sensitive or private 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 (523) 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
Usability Testing (e.g., Website or Software)	40	1	2	80
Focus Group	90	1	2	180
Customer Satisfaction Survey	1050	1	0.25	263

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The estimated total annual cost to PBGC for PBGC staff is about \$21,700 and 290 hours, as well as contractor annual costs of \$145,000, resulting in total costs of \$166,700.

PBGC staff costs were estimated as follows:

PBGC used annual wage costs from [OPM's chart](#) on wages.² PBGC's Budget Division provided benefit costs (27% of wage costs) and overhead (fixed cost of \$14,700 added to wage costs and benefits). Across the three types of collections, PBGC employees of varying GS levels are responsible for different tasks. In the following table where a task is performed by staff at different GS levels, the hourly cost is based on the average of the wage, benefits and overhead at step 5 for the lowest and highest GS levels within the range.

Tasks Performed	Total Hours	Hourly Cost	Total Cost
Submission and routing of forms, copying, filing, GS 4-8	2.75	\$34	\$94
Planning, project management, logistics, contract management, GS 13-14	308	\$75	\$23,100
Software access, licensing, and support; Internet connectivity; hardware, GS 13-15	2	\$80	\$160
Oversight and review, GS 15 - SL	2.75	\$101	\$278
Subject-matter expertise (policy, software, procedures), GS 12-15	17.55	\$76	\$1,334
Total	333.05		\$24,965

² <http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB.pdf>

For the three collections, contractor costs are as follows:

Function	Study	Details	Rate	Projects or responses annually	Total Annual Cost
Materials development, facilitation, videography, transcription, reporting	Focus group	In-person sessions	\$25,000/project	1	\$25,000
Materials development, facilitation, transcription, reporting	Usability testing	Online sessions	\$15,000/project	1	\$15,000
Materials development, fielding, data analysis, reporting	Customer satisfaction survey	Telephone interviews	\$100/response	1,050	\$105,000
				TOTAL	\$145,000

Total cost to PBGC is approximately \$170,000 (approximately \$25,000 for PBGC staff and \$145,000 for contractors).

15. Reason for Change

There is no change in the estimated annual burden on the public.

The cost burden on PBGC has decreased from \$214,000 to \$170,000. This revision is unrelated to program changes. This collection has been ongoing for three years. Over this period, procedures have been streamlined and greater efficiency achieved, resulting in revised estimates of PBGC staff time needed to perform tasks related to this information collection.

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 PBGC has no specific plans to publish its findings, PBGC may receive requests to release the information (*e.g.*, congressional inquiry, Freedom of Information Act requests). PBGC will release findings when appropriate, and may disseminate general findings when relevant. In the event this occurs, PBGC will strictly follow its "[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.