

DEPARTMENT OF TRANSPORTATION

FEDERAL TRANSIT ADMINISTRATION

SUPPORTING STATEMENT - PART A

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

(OMB Control No. 2132-0572)

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 Federal Transit Administration (hereafter "the Agency") seeks to obtain OMB's approval for the renewal of an existing information collection to gather 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 is a revision of a currently approved information collection. This updated collection includes reflects a decrease in respondents and burden hours from the previous collection in 2011. This decrease is a result of FTA's ability to more accurately reflect the number of respondents.

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.

2. How, by whom, and for what purpose the information is to be used

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 (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 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.

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."

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. Describe whether collection of information involves information technology and any consideration of using information technology to reduce the burden.

The agency will collect information electronically and/or use online collaboration tools to reduce burden. For example, public stakeholders submit an inquiry of any nature through FTA's public website at www.fta.dot.gov via the "Contact Us" tool. Following FTA's response to the stakeholder, a Customer Satisfaction Survey is automatically generated and sent to the stakeholder requesting feedback on their level of satisfaction with the service provided.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2

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

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small business or other small entities may be involved in these efforts but the Agency 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. Describe consequences to federal program or policy activities if information were not collected or collected less frequently, as well as any technical or legal obstacles to reducing burden.

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

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

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

8. Describe efforts to consult with persons outside the agency to obtain their views

A 60-day Federal Register notice was published on April 8, 2014 Vol. 79. No. 67 (pages 19413 and 19414), soliciting comments prior to submission to OMB. No comments were received from that notice.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The Agency 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 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. Describe any assurance of confidentiality provided respondents.

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 agencies 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. Additional justification for any questions of a sensitive nature.

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

12. Estimates of the hour burden of the collection of information and annualized cost to

respondents.

The annual burden hours requested is (581.8 hours) and based on the number of collections we expect to conduct over the requested period for this clearance. There is no annualized cost to the respondents.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Survey	450	1	.08	36
Survey	150	1	.25	37.5
Survey	100	1	.083	8.3
Customer Satisfaction Survey – “Contact Us Tool”	2,000	1	.08	500
TOTAL	2,700			581.8

13. Estimate of total annual cost burden to respondents or record keepers resulting from the collection of information (not including the cost of any hour burden shown in items 12 and 14).

No costs are anticipated.

14. Estimate of annualized cost to the federal government

The anticipated cost to the Federal Government is approximately \$15,500 annually. Current costs to the federal government are comprised of contractor payments, administration, maintenance and reporting.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of OMB Form 83-1.

The current estimated number of annual respondents is 2,700, a decrease of 5,400 respondents from the previous information collection approved in 2011, which reflected an estimated 8,100 respondents. This decrease is a result of FTA’s ability to more accurately reflect the number of respondents. In addition, there is currently no cost burden to respondents associated with this renewal of the existing information collection. FTA has only utilized information technology.

Since the modes of collection have been voluntary electronic submissions, FTA can accurately state that there has been no annual burden cost to respondents.

In addition, the cost to the federal government was reduced from the previous collection because the cost associated with the survey development was no longer included. FTA has not modified the survey since the development three years ago. Therefore, FTA did not incur any research and development cost from the contractor.

16. Plans for tabulation and publication for collections of information whose results will be published.

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. If seeking approval not to display the expiration date for OMB approval, explain the reasons.

We are requesting no exemption.

18. Explain any exceptions to the certification statement identified in Item 19 of OMB Form 83-I.

These activities comply with the requirements in 5 CFR 1320.9.