

**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. 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 Internal Revenue Service (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.

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

Due to the varied nature of the customer data needed, a variety of data collection methods will be employed, including web and mail surveys, in-person written surveys, focus group interviews, structured interviews, telephone surveys, and other means as appropriate. The data collected in these information collection efforts will indicate what our customers require of us and where we meet or fail to meet their needs. This customer feedback serves as a guide for making product and/or service improvement decisions.

**3. Consideration Given to Information Technology**

The methodology employed in each data effort will include a criterion for the minimization of burden on the public. This will include minimal length of the data collection instrument itself, along with the utilization of the smallest sample size necessary to obtain valid and reliable information that is consistent with the objectives of the data collection effort. Instead of standard mail surveys or face-to-face interviews, some data collection efforts will utilize live or automated telephonic interviews, e-mail, facsimile, computer website, or other available technologies.

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

We have attempted to eliminate duplication within the agency, wherever possible. Survey questions relate specifically to IRS products and services and do not duplicate what other agencies are doing. This information is generally not available from other sources.

The centralized review and approval system has been established within the Statistics of Income Division to ensure the duplication of data gathering within the IRS is eliminated. As potential duplications of data gathering are identified on proposed surveys, it will be required that these efforts be combined or eliminated.

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

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. Consequences of Not Conducting Collection**

This clearance generally involves one-time data collection activities; however, follow-up efforts may be conducted, as necessary, to measure improvement over time.

#### **7. Special Circumstances**

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes. The IRS will collect information under this clearance in a manner that complies with 5 1320.5(d) (2).

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

In accordance with 5 CFR 1320.8(d), December 2, 2013 (78 FR 72153), a 60-day notice for public comment was published in the *Federal Register*. No comments were received.

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

Normally, the only payment authorized to respondents is for those who participate in focus group interviews. Currently, participants are authorized \$25 to help defer the cost of transportation, parking, meals, childcare, and other incidental expenses associated with their participation in the focus group interview. However, it is requested that exemptions and exceptions to this payment amount be considered on a case-by-case basis.

## 10. Confidentiality

Agency policy dictates non-disclosure of taxpayer information. Survey respondents contacted by mail, FAX, Internet, or some other form of written communication will be advised on the survey form, cover letter, or other accompanying document that participation is voluntary and that the data provided will be kept private. As part of the introduction to a data gathering effort during telephone or personal interview, the interviewer will inform respondents that the survey is voluntary and that the data provided will be kept private (as permitted by law). Focus group participants will verbally receive these same assurances during opening statements of the interview sessions.

## 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 (150,000) 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
Customer Feedback Surveys	150,000	1	1	150,000

## 13. Costs to Respondents

There is no monetary cost to respondents for participating in these data gathering efforts. The vast majority of all costs associated with these efforts are born by the IRS. In a few rare instances, that involve interagency data collection efforts, an agency other than IRS may bear the survey cost.

## 14. Costs to Federal Government

The actual cost to the government is not yet determined. A Project can range from as little as a few hundred dollars (or even less) for a small local survey conducted in-house by telephone, mail or FAX, to several hundred thousand dollars (or more) for a large nationwide survey that is contracted-out to a vendor. The final cost to the government will be directly related to the extent and complexity of research conducted the three year period.

## **15. Reason for Change**

Using the past three year as a baseline, we estimate that 50,000 burden hours will be used annually, for a three-year total of 150,000 hours. This reflects the same level of burden hours.

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

Displaying the expiration date may cause problems with respondents for data collection programs that overlap the three-year authorization periods. Would-be respondents might be inclined to refuse to participate if the form carries an authorization date that is expired or is soon to expire. Internally, we have received several calls from field personnel who believe that anyone within the IRS is entitled to use approved forms with an authorization date that has not expired, even though they never officially requested an OMB approval to use the form. Removal of the OMB expiration date will help lessen the likelihood that the form is used by any unauthorized personnel.

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

These activities comply with the requirements in 5 CFR 1320.9.