#### Department of Transportation Office of the Chief Information Officer

#### SUPPORTING STATEMENT PART FOR GENERIC CLEARANCE OF CUSTOMER SATISFACTION SURVEYS

#### **FMCSA Audience Research**

#### **INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) approval for a proposed information collection (IC) titled "FMCSA Audience Research," under the OMB Control Number 2126-0061, "Generic Clearance of Customer Satisfaction Surveys," information collection request (ICR).

## A. JUSTIFICATION

#### 1. <u>Circumstances Making the Collection of Information Necessary</u>

Executive Order 12862, "Setting Customer Service Standards," September 11, 1993 (Attachment A) 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 Motor Carrier Safety Administration (FMCSA) seeks to obtain OMB approval for a generic clearance to collect qualitative feedback on our safety and compliance communication and outreach efforts. By qualitative feedback we mean open-ended and semi-structured feedback that provides useful insights on underlying perceptions and opinions surrounding an issue. This is contrasted with quantitative survey data that can be broadly generalized to a population at large.

This collection of information is necessary to enable FMCSA to garner public and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving communication and outreach efforts. The information collected from our stakeholders will help ensure that end-users—such as drivers or carrier companies—receive communication in an effective, efficient, and satisfying manner. This feedback will provide insights into stakeholder perceptions, experiences and expectations, identify trouble spots with communication, and help uncover and identify opportunities and approaches for improvement. For example, we may find that some drivers only receive FMCSA information that's disseminated through their company or a third-party group like an association. And moreover, that the employer or association filters the information by omitting pieces or providing their own interpretation of the content. Therefore, some drivers may be receiving partial or misrepresented information. This knowledge would allow FMCSA to, at a minimum, recognize this is happening, and also to develop outreach strategies with employers or local associations to more directly get safety and compliance information to drivers.

This IC supports the agency's goal of Organizational Excellence.

## 2. How, By Whom, and for What Purpose Is the Information Used

Improving agency communication requires assessment of existing and potential outreach methods and messages. FMCSA will collect, analyze, and interpret information gathered through this clearance to identify strengths and weaknesses of current communication and make improvements in outreach based on feedback.

This collection of information is necessary to enable FMCSA to garner customer and stakeholder feedbacks in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our stakeholders will help ensure that they kept abreast of and can comply with all safety programs and regulations set forth by the agency. These collections will allow for ongoing, collaborative and actionable communications between FMCSA and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program communications.

Instruments to be considered under this clearance will only include those meant to collect feedback regarding, and in order to improve, FMCSA communication. The qualitative exercises under this clearance – including online focus groups (bulletin boards) – will be of limited size and scope.

Moreover, the information collection under this requested will conform to the following characteristics:

- Information gathered will be used only internally for general communication improvement and outreach 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 <sup>1</sup>;
- 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 FMCSA or may have experience with FMCSA in the near future; and

<sup>&</sup>lt;sup>1</sup> 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."

• With the exception of information needed to provide remuneration for participants of online focus groups, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

#### 3. Extent of Automated Information Collection

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

In the case of the online focus groups, respondents will be recruited electronically through a third party. Exercises will also be conducted online through a web-based qualitative interviewing platform.

## 4. Efforts to Identify Duplication

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

## 5. Efforts to Minimize the Burden on Small Businesses

Small business or other small entities may be involved in these efforts but FMCSA 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. Impact of Less Frequent Collection of Information

Without these types of feedback, FMCSA will not have insight into the awareness and impact of its safety and compliance communication, nor will the agency have information to improve them and ensure it is reaching stakeholders efficiently and effectively.

## 7. Special Circumstances

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

## 8. Compliance with 5 CFR 1320.8

The FMCSA published a notice in the Federal Register (79 FR 51639) with a 60-day public comment period to announce this proposed information collection on August 29, 2014 (see Attachment B). The agency received no comments in response to that notice.

The FMCSA published a notice in the Federal Register (79 FR 74158) with a 30-day public comment period that announced this information would be sent to OMB for approval on December 15, 2014 (see Attachment C).

## 9. Payment or Gifts to Respondents

In the case of online focus groups (bulletin boards), FMCSA may provide stipends of up to \$150 per respondent. The design of the online bulletin boards covers three days of discussion and requires respondents to weigh-in multiple times per day (totaling approximately 30 minutes a day). While overall this is a comparable amount of time to a single in-person focus group, the independent and extended nature of the exercises, along with the difficulty identifying and recruiting the target audience – in this case drivers of the trucking and motor coach industries – require, in our experience, a higher stipend to ensure participation and prevent participants from dropping out of the study over the course of the 3 days.

## **10.** Assurance of Confidentiality

The information requested is not of a confidential nature. Consequently, no assurance of confidentiality need be given.

## **11. Justification for Collection of Sensitive Information**

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

# 12. Estimate of Burden Hours for Information Requested

An online focus group platform and instrument will be used to collect information from respondents. The total burden hours requested for six months is 112 and are based on the estimated number of collections we expect to conduct over the requested period for this clearance.

Estimated Reporting Burden – Online Focus Groups						
Type of Collection	Estimated No. of Responde nts	Number of Responses per Respondent	Total of Responses	Frequency per Response	Estimated minutes per Response	Estimated Total Annual Burden Hours
Screening/ recruitment for Online Focus Groups	480	1	480	Once	5*	40
Online Focus Groups (2)	48	1	48	Three Times	30	72**
Project Total	528		528			112

\*The screening/recruitment for the online focus groups will be conducted by combination of an initial email asking key qualification questions and interest in the study, then follow-up phone calls to confirm qualification. Therefore a large number of potential respondents will "screen out" on the initial email, so their response time will be less than 5 minutes. We have used the entire time someone would need to go through both the email and phone screening (5 minutes) as a conservative estimate for overall burden hours.

\*\*Online focus group participants agree to participate for 30 minutes a day for 3 days, but this time is spread over a 5-day period and they can choose both what days to participate and when during the day is most convenient for them.

**Estimated Annual Number of Respondents:** 528 [480 online focus group screening respondents + 48 online focus group respondents = 528].

**Estimated Annual Number of Responses:** 528 [480 online focus group screening responses + 48 online focus group responses = 528].

**Estimated Annual Burden Hours:** 112 [40 hours online focus group screening + 72 hours online focus group = 112].

The associated documents for this phase are entitled:

- PRA-2126-0061.Audience Research.Motor CarrierIndustryBB Screener.040416.docx
- PRA-2126-0061.Audience Research.CarrierIndustryBB.Discussion Guide.040416.docx

# 13. Estimate of Total Annual Costs to Respondents

No costs are anticipated.

## 14. Estimate of Cost to the Federal Government

The total anticipated cost to the Federal Government is approximately \$50,000. These costs are comprised of estimated contractor costs that are necessary to collect the information.

**Estimated Annual Cost to the Federal Government: \$50,000** [\$50,000 estimated contractor costs for Online Focus Groups = \$50,000].

## 15. Explanation of Program Changes or Adjustments

This program change increase of an estimated 112 annual burden hours is due to a new generic IC.

## 16. Publication of Results of Data Collection

Feedback collected under this generic clearance will provides useful information, but it does not yield data that can be generalized to the overall population. Findings will be used for general communication and outreach improvement, but are not for publication or other public release.

Although FMCSA does not intend to publish its findings, FMCSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). FMCSA will disseminate the findings when appropriate, strictly following FMCSA'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. Approval for Not Displaying the Expiration Date of OMB Approval

We are requesting no exemption.

## **18. Exceptions to Certification Statement**

There are no exceptions to the certification.