

**Supporting Statement for Paperwork Reduction Act Generic Information Collection Submissions for
“Fast Track 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 Department of the Army, Defense Centers of Excellence (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

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.

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)

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

4. Duplication of Information

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.”

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 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, 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 will be voluntary and will not be used for statistical purposes.

8. Consultations with Persons Outside the Agency

In accordance with 5 CFR 1320.8(d), on December 02, 2014, a 60-day notice for public comment was published in the Federal Register, Volume 79, Number 231, page 71,404. No comments were received.

The 30-Day Federal Register Notice was published on Friday, December 18, 2015, Volume 80, Number 243, page 79,032.

9. Payment or Gift

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

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 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. 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, and the instruments will be created using the questions from the question bank that has been provided as part of this submission. The total respondent burden from the public regarding product satisfaction survey measurements during this three-year approval period is estimated to be 5,003 hours. The actual number and length of surveys is unknown at this time, and will vary based on product development. The respondent time of 10 minutes per survey, on average, is based on previous product feedback surveys administered by DCoE. Additionally, the Centers for Disease Control and Prevention (CDC) used a 10-minute completion time average as their estimate for similar work (OMB 0920-0847), which appears to be an appropriate model. The projected estimates are shown in Table 1.

Table 1 - Estimation of Respondent Burden

	Number of Surveys* (Annual)	Number of Responses per Survey (Average)	Proposed Responses* (Annual)	Estimated Completion Time (Average)	Burden Hours (Annual)	Burden Hours (3 Yr. Total)
Total	40	250	10,000	10 min	1,667.7	5,003

With the maximum annual burden of 1667.7 hours, the overall annual cost of respondent time is estimated to be approximately \$37,240 or \$111,717 over three years. An average hourly wage of \$22.33 is assumed for all customers participating in the product feedback process, including clinicians and scientific users, per May 2013 data from the Bureau of Labor Statistics (source: http://www.bls.gov/oes/current/oes_nat.htm#00-0000). 16Due to the scope of this generic clearance and the variety of participant types in the target population, the average wage for “all occupations” was used in place of unpredictable numbers for each grouping within the target population. The information collections proposed here will not impose a cost burden on the respondents beyond that associated with their time to complete the voluntary surveys.

Table 2 - Labor Cost of Respondent Burden

Type of Respondent	Total Burden Hours (Annual)	Average Hourly Wage (“All Occupations”)	Total Respondent Costs (Annual)	Total Respondent Costs (3 Yr. Total)
Target Population	1667.7	\$22.33	\$37,239.74	\$111,719.22

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The product feedback surveys will be prepared, administered, and analyzed by DCoE staff (primarily by GS-13 level FTEs) and authorized contractors. Some oversight and authorizations will be provided by GS-14 and GS-15 level FTEs. The average hourly rate may be obtained from the Office of Personnel Management’s website (http://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/15Tables/html/DCB_h.aspx). In the metropolitan Washington DC area, the 2015 hourly rate for a GS-13, Step 1 is \$43.52; for a GS-14, Step 1 it is \$51.43, and for a GS-15, Step 1 it is \$60.49. DCoE intends to use DoD-approved, web-based survey administration tools (see Section 10 for additional details) that do not impose licensure fees, as an additional means to limit costs to the government.

Table 3 - Survey Cost Estimates

Type of Cost	Average Hours per Survey	Average Hourly Rate	Average Cost per Survey
Preparation, conduction, and analysis (GS-13)	20 hrs. per survey	\$43.52	\$870.4
Review and approval (GS-14)	2 hrs. per survey	\$51.43	\$102.86
Review and final DCoE approval (GS-15)	1 hr. per survey	\$60.49	\$60.49
Total	23 hrs. per survey		\$1,033.75

Table 4 - Estimates of Costs to the Federal Government

Number of Surveys per Year	Average Cost per Survey	Annual Cost	Cost for 3 Yr Period
40	\$1,033.75	\$41,350.00	\$124,050

As indicated in Table 3, DCoE estimates that it will cost \$1,033.75 per survey to develop each survey instrument, conduct the information collections, and analyze the responses. These numbers are derived from an estimate of 23 staff hours to complete this process. Estimated staff time was based on the data provided in an OMB-approved CDC application (OMB Control Number 0920-0847) for a generic clearance of similar work within their agency. Table 4 shows the estimated cost to the Federal government to administer 40 surveys, on average, annually and over the three-year period of the generic clearance, which are \$41,350 and \$124,050, respectively.

15. Reason for Change

Not applicable. This is a new request for a generic ICR.

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

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.