

**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT 1995 SUBMISSIONS  
CONTROL NUMBER 1225-0059  
DEPARTMENT OF LABOR GENERIC SOLUTION FOR OUTREACH ACTIVITIES  
MASTER FOR GENERIC CLEARANCE**

Note to Reviewer: This ICR would revise the collection to clarify that it may be used for information collections associated with DOL outreach activities, provided the information collections are otherwise consistent with this clearance. The prior name for this Information Collection Request (ICR) suggested it might be limited to conferences.. This ICR will not be used to clear documents designed to obtain feedback on significant policy related issues.

**Part A. Justification**

**1. Necessity of the information collection**

The DOL has a need periodically to collect information from the public that help assess Departmental policies, products, and services and lead to improvements in areas deemed necessary. This information collection activity provides a means to garner qualitative customer and stakeholder feedback in an efficient, timely manner. By qualitative feedback the DOL means information that provides useful insights on perceptions and opinions, but does not entail statistical surveys that yield quantitative results that can be generalized to the population of study. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues interest, 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 DOL and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

The DOL requests to continue inclusion in this generic clearance for the use of conference evaluation forms. These evaluation forms would be used by DOL agencies who conduct occasional user conferences or other outreach to educate and inform their users both Federal and non-Federal. The evaluation and other forms are a valuable tool for determining the usefulness of conferences, in developing future conferences, and in providing services/products to DOL customers. The Department wishes to clarify that specific information collection instruments submitted under this information collection request (ICR) would qualify for the generic approval process but may not be suitable for clearance under the “fast-track” generic ICR titled *Department of Labor Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery* approved under control number 1225-0088.

The following considerations will be made for all information collections associated with this ICR:

- Responses are voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is targeted to the solicitation of opinions from respondents who have experience with the program or issues under consideration;
- Information gathered will yield qualitative information; the collection will not be designed or be expected to yield statistically reliable results or be used as though the results are generalizable to the population of study;
- Collect customers' opinions of what they want and their satisfaction with what they are getting;
- Provide credible confidentiality (if applicable);
- Collect information that customers perceive as innocuous and of potential benefit to them (e.g., improved products/services); Collect "actionable" items (items that can be changed within existing constraints)
- Collect "actionable" items (items that can be changed within existing constraints).

Additionally, the following considerations will be made for all customer satisfaction surveys employing statistical methods:

- Collect information that has been pre-tested to ensure that the instruments are easy to complete and provide useful needed information.
- Include procedures necessary to ensure high response rates when it is necessary to make decisions on the results or to make generalized statements about the customers (i.e., quantitative information).

Agencies seeking to conduct an information collection will provide an abbreviated justification supporting statement and may provide a statistical methods supporting statement as circumstances warrant. These documents will include the following:

Section A -- Supplemental Supporting Statement addressing:

- Title of the Survey;
- Compliance with 5 CFR 1320.5;
- Assurances of confidentiality;
- Federal cost;
- Number of respondents;
- Percent of responses receive electronically;
- Frequency;
- Burden hour estimates (average response time and annual hours); and
- Abstract.

Section B -- Surveys and Evaluations Employing Statistical Methods

- Description of Statistical methodology (if applicable);
- Consultation with persons outside the Department;
- Office of Chief Evaluation Officer concurrence when indicated under DOL procedures; and
- Any pretest information.

The DOL will submit each instrument to the Office of Management and Budget (OMB) at least 15 working days prior to the start of the survey. The OMB will evaluate the collection instrument for compliance with the Paperwork Reduction Act of 1995. The DOL requests that the OMB issue a notice of action or issue a passback via email within a 15 working day time period. All responses will be voluntary and not require record-keeping, additional research, or documentation of responses.

The DOL will follow established procedures according to the Department of Labor Manual Series (DLMS) 1-300. This policy document establishes adequate internal independent review from the sponsoring programs to evaluate each customer satisfaction survey. This review will strive to address Departmental as well as individual program agency concerns, goals, and objectives. The Office of the Chief Evaluation Officer will review and approve statistical aspects in accordance with DLMS 1-300, as noted above. An OCEO concurrence sheet will also be provided.

**2. Purpose of the information collection**

These information collections will be designed to support the DOL mission and function. They will cover a wide range of agency responsibilities including but not limited to pension programs, occupational safety and health programs, mine safety and health programs, veterans programs, employment and training programs, statistical programs, and labor management standards.

**3. The use of automation, electronic, mechanical, or other technological collection techniques**

Innovative information technologies will be considered whenever possible in the execution of customer satisfaction surveys. Every possible effort will be considered to streamline each survey.

Since agencies provide different services, a single generic questionnaire could be unduly burdensome to the public and would lack the degree of specificity needed by the program office(s).

Agencies conducting collections cleared under this control number will make use of the medium that their service relies upon where possible. For instance, an agency telephone hotline service may develop a telephone questionnaire; or, an agency that typically services mail requests for material will develop a mail-in questionnaire; an agency may

seek to obtain high-level policy views from stakeholders regarding policy issues of interest.

These voluntary questionnaires/evaluations will gather information from Departmental customers on subjects such as:

- the user's accessibility to the service;
- the value the service has provided;
- the quality and timeliness of the response/conference;
- the demeanor of the agency representative that helped the user;
- any additional questions or comments the respondent might have for the improvement of the service; and
- other undetermined customer satisfaction issues..

The respondent may be asked to perform the following activities:

- a. For telephone and or face-to-face questionnaires
    - Listen to instructions
    - Provide oral responses
  - b. For written questionnaires
    - Read instructions
    - Provide written responses
    - Return mail questionnaires
  - c. Focus groups
    - Listen to an introduction and guidelines
    - Participate in discussions
    - Usability testing
  - d. Bulletin boards
    - Read bulletin board notice
    - Provide appropriate response
  - e. Internet surveys
    - Read instructions
    - Using an interactive web-based tools
    - Provide written responses
  - f. Conferences
    - Read or listen to instructions
    - Provide written responses
- 4. Efforts to identify duplication**

Instruments will be designed not to duplicate existing information. Each instrument will be assessed in accordance with DLMS 1-300 procedures to ensure that there is no

duplication or overlap with other departmental programs. The data obtained from each questionnaire/evaluation will be unique, as each instrument will be tailored to a specific audience with specific questions relevant to the performance of the subject program, locality, conference topic, etc.

## **5. Impact on small businesses**

While collections of information conducted under this generic clearance will not impose a significant impact on small entities, the DOL plans to minimize the burden in the following ways:

- It will allow respondents to provide information in a format convenient to them where possible, and
- It will limit the information requested to the least necessary while not compromising quality.

## **6. Consequences of less frequent collection**

Information collected will be used in a variety of ways, including the improvement of product delivery and services. In the absence of these services, the Department will be unable to meet the requirements of E.O. 13571, Streamlining Service Delivery and Improving Customer Service.

The DOL does not anticipate individual respondents will provide information on a recurring basis. The documentation forwarded to OMB prior to administering each instrument will include a description of the time during which the information collection will take place and the frequency of response.

## **7. Explain any special circumstances**

Each instrument will be conducted in a manner consistent with 5 CFR 1320.5. Should the need arise to deviate from the requirements outlined in 5 CFR 1320.5, individual justification will be provided to OMB on a case-by-case basis as part of the Supplemental Supporting Statement.

## **8. Public comment Federal Register notice and Consultation with outside representatives**

No comments were received in response to the 60-day pre-clearance Federal Register notice published on December 2, 2015 (80 FR 75471). The public was specifically informed of how the DOL intended to revise the master information collection.

No specific consultations were conducted outside the Department of Labor with representatives of the public. The surveys conducted under this clearance are however, by nature, attempts to consult the public with the quality and content of the work of the Department.

**9. Payment or gifts to respondents other than remuneration to contractors or grantees**

It is not anticipated respondents will receive any payment or gifts for completing customer satisfaction surveys or conference evaluations; however, any nominal token for responding will be justified and approved in advance by the OMB.

**10. Assurances of confidentiality provided to respondents and the basis**

Where applicable, individuals and organizations contacted will be assured of the confidentiality of their replies under 42 USC 1306, 20 CFR 401 and 422, (Freedom of Information Act), 5 USC 552a (Privacy Act of 1974), the BLS confidentiality policy, and OMB Circular No. A-130. For any given instrument, any assurance of confidentiality will be supported by law.

**11. Questions of a sensitive nature**

No sensitive data will be collected.

**12. Burden hour estimates and annualized costs to respondents for the hour burdens**

DOL will submit each generic to be approved under this collection to the OMB, in a way that according adjusts the overall burden budget for the collection. Each individual survey instrument/evaluation form submitted to OMB along with specific burden estimates. These estimates will include the total number of respondents, frequency of collection, average minutes/hours per response, and total burden hours and burden hour costs.

The annual time burden requested (80,000 hours) is based on the number of collections the DOL expects to conduct over the requested period for this clearance.

The DOL bases the following Upcoming Collections burden estimates on the Departmental experience with the program during FY12 through FY14. Based on available data, DOL estimates an average response time of 3 to 15 minutes with an average of about 6 minutes per response (.10 hours). To ensure an appropriate level of responses and hours is available for collections approved under this package; DOL estimates 800,000 annual responses and 80,000 burden hours for this iteration.

**Table 1: Burden Summary**

Category	Number of Respondents	Annual Frequency of Response	Responses	Hours per Response	Hours
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Upcoming Collections	800,000	1	800,000	0.10 hours	80,000
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Respondents to instruments cleared under this ICR will come from a variety of backgrounds from students or the currently unemployed to highly paid professionals and managerial staff to business owners; consequently, to monetize this burden, the DOL utilizes the average hourly earnings of all employees on private nonfarm payrolls. The hourly wage as computed by the Bureau of Labor Statistics, of \$24.87 (see *The Employment Situation—April 2015* at 32 DOL, Bureau of Labor Statistics, [http://www.bls.gov/news.release/archives/empst\\_05082015.pdf](http://www.bls.gov/news.release/archives/empst_05082015.pdf)). The DOL estimates the value of respondent time to be \$1,989,600. 80,000 hours x \$24.87 per hour = \$1,989,600.

**13. Total annual cost burden to respondents or record-keepers resulting from the collection**

There are no start-up or annual operation and maintenance costs incurred by respondents.

**14. Annualized cost to the Federal government estimates**

The annualized cost to the Federal government will be included with each individual Customer Satisfaction Survey Supplemental Supporting Statement.

**15. Reasons for program changes or adjustments**

Burden changes result from agency experience with the overall information collection in the past three years. This experience showed that the DOL should adjust the ceilings by decreasing responses by 11,700,000 (from 12500000 to 80,000) and increasing time by 10,000 hours.

**16. Plans for publication**

The results obtained from these various surveys will be disseminated to key policy and management officials, DOL employees, stakeholders, and the public, if applicable. Raw data may be reported with the understanding that analysis will be limited to individuals who responded to the collection.

**17. If seeking approval to not display the expiration date for OMB approval, explain reason(s)**

Most collections conducted under this generic clearance umbrella are one-time surveys. The Department is requesting an exemption from the requirement to print the reports clearance expiration date on its forms/surveys for one-time only surveys. All other information collections will include the expiration date.

**18. Exception to the certification statement**

The DOL is not requesting an exception to the certification requirements.