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 Centers for Disease Control and Prevention (CDC), National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention (NCHHSTP), (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 token of appreciations 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

[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."

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

4. **Duplication of Information**

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), a 60-day notice for public comment was published in the Federal Register Vol. 82, No. 44, Wednesday, March 8, 2017 pages 12966-12968. No public comments were received.

9. **Payment or Gift**

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. **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. The annual burden hours requested 9,690 are based on the number of collections we expect to conduct over the requested period for this clearance as use of this Generic ICR is increasing. In the previous 3 year approval period, the Center used only 2,220 burden hours. However, we anticipate an increased usage over the next three years.

Estimated Annual Reporting Burden

Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Online surveys	10500	1	30/60	5250
Discussion Groups	280	1	2	560
Focus groups	640	1	2	1280
Website/app usability testing	2000	1	30/60	1000
Interviews	800	1	2	1600
Totals	14220			9690

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately $370,500 annually. These costs are comprised of the participation of at least one CDC project officer (GS-12 or 13 levels) who will be responsible for the project design, providing project oversight, and analysis of the results. Travel may be required to provide technical assistance. In some cases, a CDC administrative staff's time may also be required. Additional costs are comprised of an estimate of applicable costs, such as operational

expenses (e.g., equipment, overhead, printing, and postage and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance. An estimated average annual cost, based on four individual projects per year, is listed below.

Expense Type	Expense Explanation	Annual Costs (dollars)
Federal Government Personnel Costs	CDC Project Officer (GS-12/13, .05 FTE)	$25,000
	CDC Administrative Staff (GS-7/9, .025 FTE)	$8,000
Cooperative Agreement or Contract	Cooperative Agreements, Task Orders, or Contracts for implementation	$325,000
CDC Travel	(4 trips)	$12,500
Total Cost		$370,500

15. Reason for Change

This is a revision to our currently approved data collection, "Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery" (OMB # 0920-1027, expiration 8/31/2017). Based on the number of burden hours actually used during the initial approval period and the number of respondents, we are requesting a decrease in the number of respondents (from 18,950 to 10,000) and burden hours (from 12,400 to 9,690).

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.