

## Supporting Statement for Paperwork Reduction Act Generic Information Collection

**AGENCY:** Pension Benefit Guaranty Corporation

**TITLE:** Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery

**OMB CONTROL NUMBER:** 1212-0066

**CONTACT:** Jo Amato Burns (326-4400 ext 3072)  
(burns.joamato@pbgc.gov)

### A. JUSTIFICATION

1. Need for the Collection of Information. 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, Pension Benefit Guaranty Corporation ("PBGC") seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on its service delivery. By qualitative feedback we mean information that provides useful insights on the public's perceptions and opinions. However, because the results obtained are not from statistical surveys, they are not quantitative results that can be generalized to the population of interest.

This collection of information is necessary to enable PBGC to obtain 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 PBGC'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 the delivery of products or services or enhance their utility. These collections will allow for ongoing, collaborative and actionable communications between

PBGC and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. Use of the Information. 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 and quality based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy and comprehensiveness of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to improve or maintain the quality of services offered to the public. If this information is not collected, vital feedback from customers and stakeholders on PBGC's services will be unavailable.

PBGC 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 PBGC (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>

---

<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."

- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or be used as though the results are generalizable to the population of interest;
- 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
- It informs respondents of the information called for under 5 CFR 1320.8(b)(3).

If these conditions are not met, PBGC 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 PBGC's 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)

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

4. Duplicate or Similar Information. No similar data are gathered or maintained by PBGC or are available from other sources known to PBGC.

5. Reducing the Burden on Small Entities. Small business or other small entities may be involved in these efforts but PBGC 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 reduced collection. Without these types of feedback, PBGC will not have timely or adequate information to adjust its services to better meet customer needs.

7. Consistency with guidelines. This collection of information is conducted in a manner consistent with 5 CFR § 1320.5(d)(2).

8. Outside Input. In accordance with 5 CFR 1320.8(d), PBGC published a 60-day notice on June 21, 2017, 82 Fed. Reg. 28363. No public comments were received in response to the 60-day notice.

9. Payments to respondents. PBGC 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 for in-person studies where respondents have to travel to an agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, PBGC 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, PBGC will only include a pledge of confidentiality that (a) is supported by authority established in statute or regulation, (b) is supported by disclosure and data security policies consistent with the pledge, and (c) does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If PBGC includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Personal questions. The information collection does not include any questions of a personal or sensitive nature.

12. Hour burden on the public. A variety of instruments and platforms will be used to collect information from respondents. Annually, over the next three years, PBGC estimates that it will conduct three activities involving about 1,630 respondents, each of whom will provide one response. The number of respondents will vary by activity: 40 for usability testing, 90 for focus groups (nine groups of ten respondents), and 1,500 for customer satisfaction surveys. PBGC estimates the annual burden of this collection of information as 635 hours: 2 hours per response for usability testing (total 80 hours); 2 hours per response for focus groups (total 180 hours); and 15 minutes per response for customer satisfaction surveys (total 375 hours).

13. Costs to Public. No costs are anticipated.

14. Costs to Federal Government. The estimated total annual cost to PBGC is \$190,000 for contractor annual costs.

For the three activities, contractor costs are as follows:

<b>Function</b>	<b>Activity</b>	<b>Details</b>	<b>Rate</b>	<b>Projects or responses annually</b>	<b>Total Annual Cost</b>
Materials development, facilitation, videography, transcription, reporting	Focus group	In-person sessions	\$25,000/project	1	\$25,000
Materials development, facilitation, transcription, reporting	Usability testing	Online sessions	\$15,000/project	1	\$15,000
Materials development, fielding, data analysis, reporting	Customer satisfaction survey	Telephone interviews	\$100/response	1,500	\$150,000
				<b>TOTAL</b>	<b>\$190,000</b>

15. Adjustments in Burden. The hour burden on the public has increased by 112 hours due to an increase in the number of surveys that will be conducted (each taking an estimated 15 minutes) from 1,050 to 1,500. The cost burden on PBGC now reports only the contractor costs incurred by PBGC, not the PBGC staff costs (previously estimated at an annual cost of about \$25,000). However, the contractor costs have increased by about \$20,000, from \$170,000 to \$190,000 due to an increase in estimated number of surveys that will be conducted, with each survey costing about \$100. The revision in the number of surveys to be conducted is unrelated to program changes.

16. Publication plans. PBGC has no plans for publication of the results of this information collection. Findings will be used for general service improvement, but are not for publication or other public release.

Although PBGC has no specific plans to publish its findings, PBGC may receive requests to release the information (*e.g.*, congressional inquiry, Freedom of Information Act requests). PBGC will release findings when appropriate, and may disseminate general findings when relevant. In the event this occurs, PBGC will strictly follow its "[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. No exemption is requested.

18. Exceptions to certification statement. The information collection is consistent with 5 CFR § 1320.9.