

Memorandum

Date:
From: Executive Director
Subj: Surveys and Information Collections Request Policy
To: See Distribution

A. General

1. Purpose:

The purpose of this document is to establish the OSDBU policy on how to request information collections, the applicable regulations, and how results are reported.

2. Background:

- a. The Information Collection under the Paperwork Reduction Act (PRA), Memorandum for Regulatory Agencies, April 7, 2010, offers clarifying guidance with respect to the Paperwork Reduction Act of 1995 (PRA) to specify its central requirements and to increase transparency and openness. The PRA establishes how information collection should be conducted.
- b. The Strategic Outreach and Communications team currently manages OSDBU's information collections. These should be initially requested by Directors or Deputy Directors via email to the Strategic Outreach and Communications (SOC) team, through OSDBUStratComm@va.gov.
- c. Quantitative data collections will be conducted by OSDBU's survey contractor, while qualitative data collections will be done by the SOC team, because this type of collection is not part of the survey contract.

3. Proponent: Strategic Outreach and Communication

B. Definitions

1. **Quantitative Research** - Objective measurements and the statistical, mathematical, or numerical analysis of data collected through polls, questionnaires, and surveys.
2. **Qualitative Research** - A method of inquiry that examines the why and how. The three most common qualitative methods are participant observation, in-depth interviews, and focus groups.
3. **Office of Management and Budget (OMB)** - OMB measures the quality of agency programs, policies, and procedures (to include information collections done by deferral

agencies) to see if they comply with the President's policies. OMB reviews any Information collection of ten or more participants conducted by or on behalf of federal agencies.

4. **Office of Privacy and Records Management (OPRM)** – OPRM serves as liaison between OMB and VA offices that intend to collect information. OPRM submits information collections to OMB once these are in compliance with its guidance.
5. **Generic/Fast Track OMB Clearance** – This five-day clearance process can be requested when the information is collected for internal purposes and meets certain parameters. This time period does not include OPRM reviews.
6. **Regular OMB Clearance** – This is a 150-day process that requires detailed information about the purpose, sample and costs of the information collections. It includes two Federal Register Notices (a 60-day and a 30-day one). This time period does not include OPRM reviews, but does include OMB reviews.
7. **ROCIS** – It stands for the Regulatory Information Service Center (RISC) and Office of Information and Regulatory Affairs (OIRA) Combined Information System. This is the website where the information collection packages are uploaded for OMB review. A one-day training is required before a user name and password can be obtained.
8. **Information Requestor**- OSDDBU Directors, Deputy Directors or staff who have requested an information collection, such as surveys, interviews, or focus groups.

C. Responsibilities

1. OSDDBU Directors or Deputy Directors are responsible for submitting initial requests.
2. SOC serves as liaison between OSDDBU staff and the survey contractor, OPRM and OMB.
3. The requestor of information is responsible to provide clear objectives on the purpose of the collection or survey.
4. SOC as Survey Contractor Liaison:
 - a. SOC serves as liaison to OSDDBU's survey contractor communicating new information collection requests or additional analysis, ensuring the accuracy of the product received on each phase of the process (e.g., questionnaires, sample methodology, data analysis, and reports).
 - b. SOC will ensure proper communication among the information requestor and the survey contractor.
5. SOC as OPRM and OMB Liaison:
 - a. SOC serves as liaison and subject matter expert (SME) to OMB clearance processes and to all phases of quantitative and qualitative information collections.

The information requestor serves as SME on the topic being investigated and will provide any information; i.e., population lists.

- b.** SOC will provide the documentation to be completed to initiate OMB's clearance process and provide guidance on how these need to be completed. The requestor is responsible for completing the forms and returning them to SOC for review and final submission to OMB. SOC will upload final documents to ROCIS.

D. Processes/Procedures

- 1.** SOC will provide support to the information requestor to complete the documents that need to be submitted to OMB and will notify them once clearance has been obtained.
 - a.** The Generic/Fast Track clearance process requires completing the following document: Generic Clearance Submission Form and the Paperwork Reduction Act-2900-0770 Generic Fast-track Qualification Criteria.
 - b.** The Regular clearance process requires completing the following document: Supportive Statement-Justification A, 30-Day FRN, and 60-Day FRN forms.
- 2.** SOC will provide the following information, data and reports:
 - a.** A questionnaire draft will be available a week after the objectives have been provided to SOC.
 - b.** Preliminary data once data has been collected
 - c.** Preliminary report two weeks after the data has been collected
 - d.** Final report a week after the preliminary report has been provided
 - e.** Deliver a presentation a week after the report has been collected
 - f.** Facilitate the request of further analyses of currently or previously collected information
- 3.** The final information collection report and presentation will be uploaded to Share Point and saved to the U drive (U:\Small & Disadvantaged Business Utilization\SOC\Education & Training\SURVEYS).

E. Standards

1. Information and regulations on the overall information collection process is available in the following OMB website:
 - a. http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title05/5cfr1320_main_02.tpl
2. Information and regulations related to the Generic/Fact Track process are available at the following web links:
 - a. <https://www.regulationwriters.com/downloads/Fast-Track%20Process-M-11-26.pdf>
 - b. <https://obamawhitehouse.archives.gov/sites/default/files/omb/assets/inforeg/pra-faqs.pdf>
3. Information and regulations related to the collection of information through social media are available in the following web links
 - c. https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pra_flexibilities_memo_7_22_16_finall.pdf

F. Coordinating Instructions

1. Information collection request:
 - a. OSDBU's Director will contact the SOC team to explain the type of information needed, objectives, schedule, and report or presentation request.
 - b. SOC will provide OMB documents to be completed by the requestor, and provided assistance as needed.
 - c. SOC, the survey contractor and the information requestor will work together to develop a collection tool; i.e., questionnaire or moderator guide
 - d. Once the documents and collection tool have been completed, SOC will submit to OPRM for review and upload to ROCIS.
 - e. OMB will review and provide feedback or request additional information through OPRM. SOC, along with the information requestor, will take action as requested by OMB.
 - f. The sampling methodology and any related action (i.e., compiling population lists) will be developed while waiting for OMB clearance.
 - g. SOC will inform the information requestor once the collection has been cleared by OMB.

2. Field Work (data collection):

- a.** The survey contractor will start the field work no later than a week after clearance from OMB.
- b.** The survey contractor will provide real-time Internet access to the data being collected as soon as the survey is deployed.
- c.** Additional data and reports will be provided as stated in section D(2).

G. For questions regarding Surveys and Information Collections Request Policy, contact OSDBUStratComm@va.gov.

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