

**Supporting Statement for Paperwork Reduction Act
Generic Information Collection Submissions for
Generic Clearance for the Collection of
Qualitative Feedback on Agency Service Delivery
OMB No. 0960-0788**

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 Social Security Administration (hereafter "the agency") seeks to obtain Office of Management and Budget (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 helps to ensure that users have an effective, efficient, and satisfying experience with the agency's programs. This feedback provides us with insights into our customer or stakeholder perceptions, experiences and expectations, provides an early warning of issues with service, or focuses attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections allow for ongoing, collaborative, and actionable communications between the agency and our customers and stakeholders. It also allows 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 collects, analyzes, and interprets information gathered through this generic clearance to identify strengths and weaknesses of current services and makes improvements in service delivery based on feedback. The solicitation of feedback targets areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. We assess responses to plan and inform our efforts to improve or maintain the quality of service offered to the public. If we did not collect this information, vital feedback from customers and stakeholders on the agency's services could be lost.

SSA only submits a collection for approval under this generic clearance if it meets the following conditions:

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- We will use the gathered information only internally for general service improvement and program management purposes; the information is not intended for release outside of the agency (if released, we will follow procedures outlined in Question #16);
- The information we gather will not be used for the purpose of substantially informing influential policy decisions ¹;
- The information we gather will yield qualitative information; the collections are not designed nor 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;
- Collections are 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 is collected only to the extent necessary and is not retained.

If these conditions are not met, the agency submits an information collection request to OMB for approval through the normal Paperwork Reduction Act process.

To obtain approval for a collection that meets the conditions of this generic clearance, SSA submits a standardized template to OMB along with supporting documentation (e.g., a copy of the comment card). The submission is automatically approved, unless OMB identifies issues within 5 business days.

The types of collections this generic clearance covers includes, but are not limited to:

- Customer comment cards/complaint forms;
- Small discussion groups and interviews;
- 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 and interviews (e.g., post-transaction surveys; opt-out web surveys);
- In-person observation testing (e.g., website or software usability tests);
- Other collection instruments, observations, and methods as yet to be determined.

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.”

We have established a manager who serves this generic clearance and is responsible for conducting independent reviews 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, we collect information electronically and use online collaboration tools to reduce burden.

4. Duplication of Information

SSA does not gather or maintain similar data, nor do we have access to similar data from other sources.

5. Reducing the Burden on Small Entities

Small businesses or other small entities may be involved in these efforts but the agency minimizes the burden by 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 does not have timely information to adjust its services to meet customer needs.

7. Special Circumstances

There are no special circumstances. The information we collect is voluntary and is not used for statistical purposes.

8. Consultations with Persons Outside the Agency

In accordance with 5 *CFR* 1320.8(d), on April 1, 2017 (82 FR 17494), SSA published the 60-day Federal Register Notice and we received no public comments. SSA published the 30-day Federal Register Notice on June 19, 2017 at 82 FR 27939. If we receive any public comments in response to the 30-day Notice, we will forward them to OMB.

9. Payment or Gift

The agency does not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. However, 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, we will submit a justification to OMB for any proposed stipend. Such stipends are routinely less than that provided to respondents in in-person studies, or 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, SSA provides additional justification in the request for clearance for these specific activities.

10. Confidentiality

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If a confidentiality pledge is deemed useful and feasible, the agency only includes a pledge of confidentiality that: (1) is supported by authority established in statute or regulation; (2) is supported by disclosure and data security policies that are consistent with the pledge; and, (3) does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If SSA includes a pledge of confidentiality, we include the citation for the statute or regulation supporting the pledge.

11. Sensitive Nature

We will ask no questions of a personal or sensitive nature.

12. Burden of Information Collection

SSA uses a variety of instruments and platforms to collect information from respondents (see #2 above). The average annual burden hours requested (**12,853 hours**) are based on the number of collections (**126**) we expect to conduct in one year within the requested period for this clearance from **68,495** respondents (average of yearly respondents). Below is the per annual burden data breakdown.

	Number of Respondents (burden for all activities within that year)	Frequency of Response	Range of Response Times (minutes)	Estimated Total Annual Burden (burden for all activities within that year; reported in hours)
Year 1 (August 2017 – August 2018)	64,935	1	3-360	12,649
Year 2 (August 2018 – August 2019)	69,285	1	3-360	12,918
Year 3 (August 2019 – August 2020)	71,265	1	3-360	12,992
Totals	205,485			38,559

13. Costs to Respondents

We anticipate no costs to respondents.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$131,204 annually. These costs are comprised of operational expenses (e.g., equipment, overhead, printing, postage, and

support staff), contractor payments, and any other expenses necessary to collect the information approved under this generic clearance.

15. Reason for Change

Since the last time we cleared this information collection, the agency has further developed our customer satisfaction activities, estimated our agency needs, and fine-tuned our collection methods based on the Fast Track protocol. We are projecting fewer representative annual burden for the next three years, as we anticipate we will need fewer customer satisfaction activities.

16. Tabulation of Results, Schedule, Analysis Plans

Feedback collected under this generic clearance provides useful information, but it does not yield data that we generalize to the overall population. SSA uses the findings for general service improvement, and not for publication or other public release.

Although the agency does not intend to publish its findings, SSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). In such cases, the agency disseminates the findings when appropriate, strictly following SSA's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and includes 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*.

B. STATISTICAL METHODS

Data collection methods and procedures vary; however, the primary purpose of these collections is for internal management purposes; there are no plans to publish or otherwise release this information.

1. Universe and Respondent Selection

The activities under this clearance may involve samples of self-selected customers, as well as convenience samples, and quota samples, with respondents selected either to cover a broad range of customers or to include specific characteristics related to certain products or services. We will not use the results to make statements representative of the universe of study, to produce statistical descriptions (careful, repeatable measurements), or to generalize the data beyond the scope of the sample. SSA intends to describe fully in each collection request the specific sample planned for each individual collection and the method for soliciting participation.

Qualitative surveys are tools used by program managers to change or improve programs, products, or services. The accuracy, reliability, and applicability of the results of these surveys are adequate for their purpose.

The samples associated with this collection are not subjected to the same scrutiny as scientifically drawn samples where estimates are published or otherwise released to the public.

2. Procedures for Collecting Information

Data collection methods and procedures vary; we provide the specifics with each collection request. The Agency uses a variety of methodologies for these collections. For example, the Agency or its contractors use commercial survey-specific software to automate its collection and analysis of feedback. In addition to physical copies, we may electronically disseminate information collection instruments and post them on target pages of the Agency's web site. We may also use telephone scripts, personal interviews, and focus groups with professional guidance and moderation.

3. Methods to Maximize Response

Information collected under this generic clearance do not yield generalizable quantitative findings; the information collected can provide useful customer input, but it does not yield data about customer opinions that we can generalize.

4. Testing of Procedures

We may pretest with internal staff; a limited number of external colleagues; or via customers who are familiar with the programs and products. If the number of pretest respondents exceeds nine members of the public, the SSA submits the pretest instruments for review under this generic clearance.

5. Contacts for Statistical Aspects and Data Collection

We will obtain for each program, when appropriate, information from statisticians in the development, design, conduct, and analysis of customer or partner service surveys. This statistical expertise is available from agency statisticians or from contractors. The Agency includes the names and contact information of persons consulted in the specific information collection requests submitted under this generic clearance.