

**DEPARTMENT OF THE TREASURY**  
**ALCOHOL AND TOBACCO TAX AND TRADE BUREAU**  
**Supporting Statement Part A -- Information Collection Request**  
**OMB Control Number 1513-0132**

Information Collection Request Title:

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery.

**A. Justification**

*1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.*

The Alcohol and Tobacco Tax and Trade Bureau (TTB) administers the Federal Alcohol Administration Act (FAA Act, 27 U.S.C. chapter 8) and portions of the Internal Revenue Code of 1986, as amended (IRC, 26 U.S.C. chapter 51 (distilled spirits, wine, and beer), chapter 52 (tobacco products, processed tobacco, and cigarette papers and tubes), and sections 4181-4182 (firearms and ammunition excise taxes)), pursuant to section 1111(d) of the Homeland Security Act of 2002, as codified at 6 U.S.C. 531(d). In addition, the Secretary of the Treasury has delegated certain FAA Act and IRC administrative and enforcement authorities to TTB through Treasury Department Order 120-01.

Executive Order 12862, Setting Customer Service Standards, sets forth a standard of quality for services provided to the public by Federal agencies—customer service equal to the best in business—and it directs agencies to meet this goal through the use of surveys and other means. Therefore, to meet this goal, TTB uses various surveys, focus groups, and other information collections to gather feedback on agency programs and service delivery from regulated industry members and other stakeholders (customers) in an efficient and timely manner.

This generic clearance and the feedback information collections approved under it are necessary to provide TTB with information on customer perceptions, experiences, and expectations regarding its programs and services. The collected information can give TTB early warning of issues with services or focus TTB's attention on areas where changes in communication, training, or operations will improve delivery of products or services. The approved information collections also allow for ongoing, collaborative, and actionable communications between TTB and its customers. In sum, the collected information allows TTB to improve its program management and service delivery, which helps TTB to ensure that its customers have effective, efficient, and satisfactory experiences when interacting with the agency.

This information collection is aligned with —

- Line of Business/Sub-function: General Government / Taxation Management.
- IT Investment: None.

*2. How, by whom, and for what purpose is this information used?*

TTB uses the information collections approved under this generic clearance to gather feedback from its customers in order to improve its programs and service delivery. The information collection instruments used by TTB to collect public feedback may include customer satisfaction surveys, small discussion or focus groups, usability tests, and in-person observations.

TTB will collect, analyze, and interpret the information collected through the instruments approved under this generic clearance to identify strengths and weaknesses in, and improve delivery of, its programs and services. These customer feedback solicitations will focus on areas such as the accuracy, appropriateness, and efficiency of TTB's programs and services, and the timeliness and resolution of service delivery issues.

*3. To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?*

When appropriate, TTB will use electronic or online information collection instruments, such as Survey Monkey, to gather customer feedback on its programs and services.

*4. What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?*

This information collections approved under this generic clearance gather customer feedback information that is pertinent and specific to each respondent's experience and interaction with TTB's programs and services. As far as TTB is able to determine, similar information is not available elsewhere.

*5. If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?*

Participation in TTB customer satisfaction surveys and the other information collections issued under this generic clearance is voluntary. Small businesses or other small entities may elect to use the approved information collection instruments, and TTB will minimize the burden on such entities by using sampling, asking for readily available information, and using short, easy-to-complete electronic and online collection instruments. As such, this generic clearance and the information collections approved under it do not have a significant impact on a substantial number of small businesses or other entities.

*6. What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?*

Without the use of the information collections issued under this generic clearance, TTB will not be able to gather timely feedback from its customers and would thus not be able to

make needed adjustments to its programs and services in order to improve its customer service delivery.

*7. Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines?*

There are no special circumstances associated with this information collection.

*8. What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.*

To solicit comments from the general public, TTB published a “60-day” comment request notice for this generic clearance in the Federal Register on April 4, 2017, at 82 FR 16471. TTB received no comments on this information collection in response.

*9. Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?*

Except as noted below, TTB will not provide payment or other forms of remuneration to respondents to its customer feedback information collections or instruments. In the case of in-person focus groups and usability tests, TTB may provide stipends of up to \$75.00 per participant. In cases where TTB plans to offer a stipend, TTB will provide OMB with justification for the stipend in the request for clearance of the specific information collection.

*10. What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?*

No specific assurance of confidentiality is provided for this generic clearance request. However, Federal law at 5 U.S.C. 552 protects the confidentiality of proprietary information obtained by the Government from regulated businesses and individuals, and 26 U.S.C. 6103 prohibits disclosure of tax returns and related taxpayer information unless disclosure is specifically authorized by that section.

For each information collection issued under this generic clearance, TTB will include a statement regarding its planned use of the collected information, including any assurance of confidentiality or any public release of such information.

*11. What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.*

This generic clearance and the information collections issued under it contain no questions of a sensitive nature. In addition, this generic clearance and the information collections issued under it do not collect personally identifiable information (PII) in any electronic system. The customer satisfaction surveys and other collection instruments issued under

this generic clearance, including in-person collections, are completed or reported anonymously by respondents. Therefore, no Privacy Impact Assessment (PIA) or System of Records Notice (SORN) is required for this generic clearance or the information collections issued under it.

However, TTB may use PII, such as names, mailing and email addresses, and telephone numbers, provided under other information collections and stored in various TTB electronic systems to develop lists of, or to contact, potential respondents to the information collection instruments issued under this generic clearance. These electronic systems include Certificates of Label Approval Online (COLAs Online), Formulas Online (FONL), Permits Online (PONL), Regulatory Major Application System, Special Occupation Tax/Floor Stocks Tax system, and Tax Major Application system. Privacy Impact Assessments for these electronic systems have been conducted and a Privacy Act System of Records notice (SORN) has been issued for these systems under TTB .001–Regulatory Enforcement Record System, which was published in the Federal Register on January 28, 2015, at 80 FR 4637. TTB's PIAs are available on the TTB website at <http://www.ttb.gov/foia/pia.shtml>.

*12. What is the estimated hour burden of this collection of information?*

TTB will use a variety of information collections to gather customer feedback from respondents. These respondents will be TTB-regulated industry members, stakeholders, and other members of the public who have contacted or done business with the agency. TTB estimates that it will survey, or request feedback from, up to 25,000 respondents annually, with each respondent making one annual response at an estimated average burden of one hour per response, for a total estimated annual burden of 25,000 hours.

(In summary: 25,000 respondents x 1 annual response each = 25,000 annual responses x 1 hour per response = 25,000 annual burden hours.)

*13. What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?*

There is no cost to respondents associated with this generic clearance or the voluntary information collections issued under it.

*14. What is the annualized cost to the Federal Government?*

The costs to the Federal Government associated with this generic clearance vary by the type of information collection and instrument used to collect customer feedback information.

A typical 5,000 respondent customer satisfaction survey conducted by TTB via an online third-party survey company costs approximately \$700, while focus groups and other in-person information collections cost between \$1,000 and \$4,000 per collection. Given a rate of three online surveys and one in-person information collection per year, TTB estimates that annual cost of the information collections approved under this generic clearance to be up to \$6,100.

*15. What is the reason for any program changes or adjustments reported?*

There are no program changes associated with this generic clearance request. As for adjustments, TTB is increasing the number of potential respondents and resulting estimated burden hours for the information collections issued under this generic clearance from 10,000 to 25,000 because TTB plans to annually issue more customer surveys and other feedback collections than it has in the past, and it plans to issue those collections to larger respondent pools.

*16. Outline plans for tabulation and publication for collections of information whose results will be published.*

The customer feedback collected under this generic clearance provides useful information to TTB, but it does not yield data that can be generalized to the overall population. TTB will use the findings to improve its programs and service delivery, but TTB will not publish or publically release the results of the information collections approved under this generic clearance. However, TTB may receive requests to release collected information from Congress or from the public under the Freedom of Information Act. In response to such requests, TTB will disseminate the findings of information collections issued under this generic clearance when appropriate and such disclosures will include a discussion of the limitation of such qualitative results.

*17. If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?*

As a cost saving measure for TTB and to prevent user confusion, TTB is seeking approval not to display the expiration date for OMB approval of this generic clearance on any information collections issued under it. By not displaying the expiration date of this generic clearance, TTB will not have to update the expiration date on reusable customer survey and other information collection instruments, whether issued on paper or issued electronically. Additionally, not displaying the OMB approval expiration date on information collection instruments issued under this generic clearance will avoid confusion among members of the public who may respond to reused collections with expiration dates displayed on them that have passed.

*18. What are the exceptions to the certification statement?*

- (f) This is not a recordkeeping requirement.
- (i) No statistics are involved.