

**Supporting Statement for  
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”  
OMB Control No. 3095-0070**

**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. To aid in this effort, we must collect feedback from the public. We seek OMB clearance for this generic information collection, which allows us to gather qualitative customer and stakeholder feedback in an efficient, timely manner as part of our commitment to continuously improve service delivery. By qualitative feedback, we mean information that provides useful insights into customers’ or stakeholders’ perceptions and opinions, but not statistical surveys that yield quantitative results that we could generalize to the population. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with our programs, in compliance with E.O. 12862.

**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. This feedback provides insights into perceptions, experiences, and expectations, provides an early warning of issues with service, or focuses attention on areas where communication, training, or operational changes might improve delivery of products or services. We will not use this qualitative generic clearance for quantitative information collections designed to yield reliably actionable results, such as monitoring trends over time or documenting program performance.

We 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 our services will be unavailable.

We will submit a specific information collection for approval under this generic clearance only if it meets the following conditions:

- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- It is targeted to solicit opinions from respondents who have experience with the program or may have experience with the program in the near future;
- Personally identifiable information (PII) is collected only to the extent necessary<sup>1</sup> and is not retained;
- 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;

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<sup>1</sup> For example, collections that collect PII to provide remuneration for participants of focus groups and cognitive laboratory studies will be submitted under this request. All Privacy Act requirements will be met.

- Information gathered will not be used to substantially inform influential policy decisions <sup>2</sup>; and
- 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.

If these conditions are not met, we will submit an information collection request to OMB for approval through the normal PRA process.

As a general matter, information collections under this generic collection request will not result in any new system of records containing privacy information and will not ask questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

To obtain approval for a collection that meets the conditions of this generic clearance, we will submit a standardized form 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 five 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)

We have established an internal review process in which the PRA Clearance Officer conducts an independent review of each information collection proposed by a program office or function under this generic clearance umbrella. The PRA Clearance Officer reviews the proposed collection to ensure it is compliant with the terms of this clearance prior to submitting it to OMB.

### **3. Consideration given to information technology**

We collect information electronically or use online collaboration tools for nearly all our current information collections cleared under previous versions of this generic clearance. We will continue to do so with new information collections under this generic clearance whenever possible.

### **4. Duplication of information**

We do not otherwise gather or maintain similar data, nor are we aware of other sources that would provide it.

### **5. Reducing the burden on small entities**

Primarily, respondents to collections under this generic clearance will be individuals. However, some small businesses or other small entities may also make use of our services or facilities and thus may be asked for information as well. We 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**

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<sup>2</sup> As defined in OMB 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.”

Without these types of feedback, we will not have timely information to adjust our services to meet customer needs and improve their use of our records, programs, and facilities.

**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), on July 5, 2017, we published a 60-day public comment notice in the *Federal Register* (82 FR 31079). We received no comments.

**9. Payment or gift**

We will not provide payment or other forms of remuneration to respondents of the various forms of collecting feedback under this clearance.

**10. Confidentiality**

If a confidentiality pledge is deemed useful and feasible, we will include only 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.

**11. Sensitive nature**

No questions will be asked that are of a personal or sensitive nature.

**12. Burden of information collection**

We will use a variety of instruments and platforms to collect information from respondents. The annual burden hour estimate (20,000-25,000) is based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Qualitative customer satisfaction surveys	120,000-150,000	1	10-30 minutes	20,000-25,000

**13. Costs to respondents**

No costs are anticipated.

**14. Costs to Federal Government**

The anticipated cost to the Federal Government is approximately \$200,000 annually. These costs comprise staff and overhead.

**15. Reason for change**

The reason for an increase in the estimated number of respondents and total hours is due to the National Personnel Records Center (NPRC) Customer Satisfaction Survey migration from a paper-based to an online survey.

NPRC receives and processes roughly 1.2 million requests for military service and medical treatment records annually. Historically, at the end of the fulfillment process, a response letter is printed and requested records are assembled into a response package. Each week, roughly 70 paper-based customer satisfaction surveys, soliciting feedback from the customer regarding their experience with that particular transaction, are inserted into random response packages. Customers are encouraged to fill out and mail the surveys to our third-party survey collector using the pre-paid envelope included.

Instead of this paper-based process, we are migrating to an online process in which all customer feedback will be collected, registered, and analyzed on an online platform. This platform will ensure the preservation, validity, and quality of the survey data. The new survey process provides each customer with the link to the online survey, rather than just 70 customers a week, so it increases the pool of potential respondents. It is a simple survey monkey survey, so is easier and faster to fill out, and requires no additional effort to return it to NARA.

The major benefits of migrating this survey to an online format are increased ease of accessibility by respondents, potential increase in the number of people who will provide feedback, thus increasing the respondent sample base, and a decrease in processing costs with an increase in data collection, registration, and analysis efficiency.

We estimate that the easier access and online format has the potential to significantly increase the number of respondents, which carries with it an increase in the overall total of burden hours. As a result, we have increased the estimated number of respondents and hours. However, we believe that the actual experience for each respondent will be less burdensome and time-consuming than with the previous paper survey process, and that this belies the apparent increase in burden and time implied by the higher estimated numbers.

## **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, and may be included as supplemental information in annual reports to Congress.

## **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 will vary; however, the primary purpose of these collections will be 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, with respondents selected either to cover a broad range of customers or to include specific characteristics related to certain products or services. Results will not be used 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. The specific sample planned for each individual collection and the method for soliciting participation will be described fully in each collection request.

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 will vary and the specifics of these will be provided with each collection request. We expect to use a variety of methodologies for these collections. For example, we or our contractors may use commercial survey-specific software to automate collection and analysis of feedback. In addition to physical copies, information collection instruments may be electronically disseminated or posted on target pages of our web site. Telephone scripts, personal interviews, and focus groups with professional guidance and moderation may also be used.

### **3. Methods to maximize response**

Information collected under this generic clearance will not yield generalizable quantitative findings; it can provide useful customer input, but it does not yield data about customer opinions that can be generalized. However, we have migrated the National Personnel Records Center (NPRC) Customer Satisfaction Survey from a paper-based to online survey, which we believe will cause a significant increase in responses, and we are conducting other feedback efforts in similar ways to maximize responses.

### **4. Testing of procedures**

Pretesting may be done with internal staff, a limited number of external colleagues, or customers who are familiar with the programs and products. If the number of pretest respondents exceeds nine members of the public, we will submit the pretest instruments for review under this generic clearance.

### **5. Contacts for statistical aspects and data collection**

Each program will obtain information from statisticians in the development, design, conduct, and analysis of customer/partner service surveys, when appropriate. This statistical expertise will be available from agency statisticians or from contractors and we will include the names and contact

information of people we consult in the specific information collection requests submitted under this generic clearance.