

**Supporting Statement for Paperwork Reduction Act Generic Information Collection  
Submissions for:  
“Fast Track Generic Clearance for the Collection of Qualitative Feedback on Agency Service  
Delivery: Interactive Customer Evaluation (ICE) System”**

**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 Washington Headquarters Service/Enterprise Management Division of the Department of Defense (hereafter “the Agency”) seeks to obtain 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 will help ensure that users have an effective, efficient, and satisfying experience with the Agency’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 delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

The purpose of the Interactive Customer Evaluation (ICE) system is to provide the Defense community with an on-line customer feedback system, replacing the current paper comment cards and other customer satisfaction data collection mediums used by DoD organizations. Members of the public who respond on the ICE system are authorized customers and have been provided a service through DoD customer service organizations. The system provides a direct channel for customer needs, complaints, and suggestions in areas such as Education, Housing, Medical Facilities, Pass and ID, and installation shopping centers.

In accordance with DoD Directive 5105.53, the Office of the Secretary of Defense, the Director of Administration and Management, has the responsibility to review, evaluate and develop recommendations to improve the organization, functions and management of DoD activities and programs. The ICE system provides a medium required by Executive Order 12862 to survey customers and make information, services and complaint systems easily accessible. The ICE system also furthers on the DoD’s information management goals, which implements Section 5123 of the Clinger-Cohen Act of 1996. The goal is to improve the efficiency and effectiveness of agency operations through the use of information technology by providing services that satisfy customer information needs.

## 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 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 the Agency's services will be unavailable.

The Agency 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 the agency (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>;
- 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 ;
- 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
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the Agency 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:

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<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."

- 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)

The Agency 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. Consideration Given to Information Technology**

Comment Cards are completed and submitted electronically with reduces burden on respondents to the fullest extent possible. The Web screens for an example ICE comment card are included in this submission.

### **4. Duplication of Information**

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency.

### **5. Reducing the Burden on Small Entities**

Small business or other small entities will most likely not be involved in these information collection efforts given that the comment cards are designed for individuals to provide feedback. But if small businesses are involved, the Agency 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 Not Conducting Collection**

Without these types of feedback, the Agency will not have timely information to adjust its services to meet customer needs.

### **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 August 31, 2017, a 60-day notice for public comment was published in the *Federal Register*, Volume 82, Number 168, page 41398. No comments were received.

The 30-Day Federal Register Notice was published on October 27, 2017, Volume 79, Number 207, page 49794.

## **9. Payment or Gift**

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

## **10. Confidentiality**

Submissions are completely anonymous unless the end user chooses to supply their contact information in order to receive a response from the service provider manager. Appropriate steps are taken to protect the privacy of submissions within the ICE system. The ICE system is certified and accredited IAW DIACAP and is hosted at a secure facility by DISA. Manager access is by user accounts which are restricted by roles. The ICE Policy provides guidelines for appropriate control of data and access.

A Privacy Advisory is provided to ICE comment card respondents.

## **11. Sensitive Nature**

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

## **12. Burden of Information Collection**

The comment cards which will be used to collect information from respondent will be created using the questions in the question banks that have been provided as part of this submission. Most comment card submissions to the ICE system are from government employees providing feedback on services provided by a DoD organization in the performance of their duties. But a small subset of the total number of submissions come from the members of the "public." It is estimated that approximately 76,311 members of the public per year will submit responses via the ICE system and, on average, each responding to 2 comment cards per year for a total of 152,622 responses. Regarding respondent labor burden of the public respondents, it will take approximately three minutes to fill out a comment card. The estimate of public respondent burden is computed as follows: 152,622 @ 3 minutes each = 457,860 minutes or approximately 7,631 hours.

Regarding the correspondent labor cost of respondent burden, the hourly rate was computed using an average income based on U.S. OPM 2017 General Schedule, GS-7, Step 5: 7,631 (hours) x \$ 19.20 (per

hour) = \$146,517 yearly. Per response, the cost of completing a comment card based on this hourly rate is approximately \$0.96.

### **13. Costs to Respondents**

No costs to respondents are anticipated.

### **14. Costs to Federal Government**

The anticipated cost to the Federal Government is approximately \$209,309 annually. These costs are comprised of \$104,000 for server hosting at DISA (e.g., operational and maintenance costs) and \$105,309 for government staff labor, a decrease from 2014, to maintain the system and support users. This system and government staff also directly support the collection of over 900,000 submissions from DoD employees located at over 700 bases around the world annually.

### **15. Reason for Change**

There is an increase in respondent burden from 2014 to 2017. The increase is due to improvements made by the ICE system to track public responses. A question was added to many of the ICE comment cards that ask respondents to identify whether they are a civilian/military employee.

### **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, but are not for publication or other public release.

Although the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "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**

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.