

Supporting Statement A for

Generic Clearance for the Collection of Qualitative
Feedback on Agency Service Delivery (NICHD)

OMB Number: 0925-0643, Expiration Date: 10/31/17

This is a request to reinstate without change the original submission and all changes throughout this document are in yellow highlight

Date: October 27, 2017

Check off which applies:

- New
- Revision
- Reinstatement with Change
- Reinstatement without Change
- Extension
- Emergency
- Existing

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Attachments

1. Sub-Study Template Submission Form
2. List of Sub-study Approvals

A. Justification

This is a **reinstatement without change** to the previously approved submission (0925-0643). There are no changes being requested for this submission. The information collection activity has garnered qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with the Administration's commitment to improving service delivery. This generic has provided information about the *Eunice Kennedy Shriver* National Institute of Child Health and Human Development's (NICHD) 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. It has also allowed feedback to contribute directly to the improvement of program management. Feedback collected under this generic clearance provides useful information but it does not yield data that can be generalized to the overall population.

A.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 Eunice Kennedy Shriver National Institute of Child Health and Human Development (NICHD) (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. This generic clearance is a vital vehicle for speedy reviews of simple information collections, and for this reason it is important this information collection continues.

A.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 ¹;
- 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:

- 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)

There have been twelve information collections approved under this generic clearance since its extension three years ago, all contributing significantly to the mission of NICHD. The projects have ranged from customer satisfaction surveys to focus groups. Attachment 2 provides a list of the information collections (sub-studies) that have been previously approved since the initial Fast Track Generic Clearance approval.

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.”

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.

A.3 Use of Information Technology and Burden Reduction

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

As state previously, personally identifiable information (PII) is collected only to the extent necessary and is not retained. Therefore, the Privacy Act does not apply.

A.4 Efforts to Identify Duplication and Use of Similar Information

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency. Because information collections under this clearance are expected to be unique to Agency products and programs as the need arises, it is unlikely that other relevant information collections exist.

A.5 Impact on Small Businesses or Other Small Entities

Small business or other small entities may be involved in these efforts but 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.

A.6 Consequences of Collecting the Information Less Frequently

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

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

A.8.1 Comments in Response to the Federal Register Notice

In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment was published in the *Federal Register*, Vol. 82, No. 165, page 40778 on Monday, August 28, 2017. No public comments were received.

A.8.2 Efforts to Consult Outside Agency

Outside agencies are routinely consulted as appropriate to information collections in order to provide input on the appropriateness and burden of information collection forms. For example, for the Survey of Researchers Studying Rodent Models for Down Syndrome, the program official worked with the Trisomy 21 Research Society on survey questions and distribution.

A.9 Explanation of Any Payment of Gift to Respondents

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. 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, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies, 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, the Agency will provide OMB with additional justifications in the request for clearance of these specific activities.

There is extensive literature to support the use of incentives, primarily monetary incentives, as a supplement or complement to other efforts of persuasion to ensure recruitment of a representative sample, especially among not-yet-reached and minority populations.^{2,3,5} In studies for both commercial market research and social sciences, findings indicate that respondents who receive these tokens of appreciation provide valid input, and their inclusion makes for a more representative sample. It is standard practice in commercial market research to offer recruited respondents some form of remuneration for the time they spend engaged in a focus group, in-depth interview, and sometimes an online survey. Small amounts of money, a free meal or snack, remuneration for parking and/or transportation, and/or a raffle are most often used.

A.10 Assurance of Confidentiality Provided to Respondents

If a confidentiality pledge is deemed useful and feasible, the Agency will only include 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. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

A.11 Justification for Sensitive Questions

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

² Yu S, Alper HE, Nguyen A-M, et al. The effectiveness of a monetary incentive offer on survey response rates and response completeness in a longitudinal study. *BMC Medical Research Methodology*. 2017;17:77. doi:10.1186/s12874-017-0353-1.

³ Knoll M, Soller L, Ben-Shoshan M, et al. The use of incentives in vulnerable populations for a telephone survey: a randomized controlled trial. *BMC Research Notes*. 2012;5:572. doi:10.1186/1756-0500-5-572.

⁵ Singer, E, and Cong, Y. 2013. "The Use and Effects of Incentives in Surveys." *Annals of the American Academy of Political and Social Science*, 645(1): 112-141.

A.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (4,950) are based on the number of collections we expect to conduct over the requested period for this clearance. The type of respondents could be the general public or people from specific groups. They will be specified in substudy requests.

Table 12-1 Estimated Annualized Burden Hours

Type of Collection	No. of Respondents	Number of Responses per Respondent	Average Burden Per Response (in hours)	Total Annual Burden Hours
Conference/Training - Pre and Post Surveys	100	1	15/60	25
Usability Testing	100	1	30/60	50
Focus Groups	750	1	1	750
Customer Satisfaction Survey	13,500	1	15/60	3,375
In-depth Interviews or Small Discussion Group	750	1	1	750
Total	15,200	15,200		4,950

A.12-2 Annual Cost to respondent

Based on the mean hourly wage rate for all occupations in 2016, the anticipated cost is \$118,107.

Table 12-2 Annualized Cost to Respondents

Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
All	4,950	\$23.86	\$118,107
TOTAL	4,950		\$118,107

*Bureau of Labor Statistics: The General Public rate was obtained from the https://www.bls.gov/oes/current/oes_nat.htm#00-0000

A.13 Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers

There is no other cost burden to respondents or record keepers. Information collections with use existing equipment that is provided for work-related use by The Agency.

A.14 Annualized Cost to the Federal Government

The approximate annualized cost to the government for this data collection effort is \$53,593. These costs are comprised of: federal employee salaries for data collection oversight, contractor staff salaries for preparation of information collection materials, and operational expenses (e.g., equipment, printing, and postage). The table below provides the cost breakdown for the annualized cost to the federal government.

Cost Descriptions	Grade/Step	Salary	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
NICHD PRA/OMB Liaison	13/5	\$104,433	15%		\$15,664
Program Staff	14/6	\$130,692	5%		\$6,535
Contractor Cost					
Project Manager		\$169,328	5%	\$40,639	\$10,485
Communications Associate		\$90,946	10%	\$21,682	\$11,263
Senior Digital Analyst		\$139,630	5%	\$33,288	\$8,646
Travel					\$0
Other Cost					
Operational Costs for Data Collection Activities (e.g., printing, postage, equipment), non-labor					\$1000
Total					\$53,593

A.15 Explanation for Program Changes or Adjustments

This is a request for reinstatement without change for 0925-0643 – Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NICHD). A reinstatement is requested as NICHD has a continued need to solicit customer and stakeholder feedback in an efficient, timely manner, in accordance with the Administration’s commitment to improving service delivery. There are no changes to the purpose/scope of this submission from the previously approved submission. Additionally, there are no changes in the burden hours being requested.

A.16 Plans for Tabulation and Publication and Project Time Schedule

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.

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable. OMB expiration dates will be displayed on all information collection forms.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

None