

**Supporting Statement for Paperwork Reduction Act Generic Information Collection
Submissions for
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”**

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 Environmental Protection Agency (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.

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, 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:

- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
Qualitative surveys are tools used by program managers to change or improve programs, products, or services. 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;
- In-person or remote observation testing (e.g., website or software usability tests)
Usability testing of a website, software, or application can provide valuable insight into the user's experience of attempting to accomplish a task. It can be done in-person or remotely through an online session. Users may perform a task and then explain what they find or have trouble finding, what was confusing, what could be improved, or what worked well. This visual gives the developers an opportunity to see the application through the eyes of the users. Usability testing enables users to drive the development of a system so that it will be easier for people to use.

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."

- **Conferences/Workshops/Webinars**
Customer satisfaction surveys are used to obtain feedback on whether or not the session met the participant's desired outcomes. The responses to these surveys will be analyzed so that future conferences/workshops/webinars may be improved upon to better meet the needs of participants.
- **EPA Websites, Publications, Data Systems**
Customer satisfaction surveys of EPA's websites, publications, and data systems provide valuable qualitative feedback of these services. Did you find what you were looking for on EPA's website today? With thousands of pages of content being delivered by EPA, it can be a challenge to get a full view of how we are doing. Analyzing bounce rates and time spent on page does not give the complete picture of an EPA website or system. This qualitative feedback helps EPA to better understand how the services are being received. The insight gained from these survey responses will enable EPA to provide websites, publications, and data systems that are easier for the public to use and find what they seek.
- **Community/Industry Outreach and Education Programs**
EPA serves the public through offices across the country. When EPA is involved with a community, it is important to include these respondents in the collection of customer service feedback. One example was with collecting feedback of Technical Assistance Grantees (TAG). The Superfund program asked grantees if there was any area where EPA's technical assistance was lacking. The insight gained from the responses to this survey enabled EPA to understand how the TAG program was performing and what could be done to improve upon future grant programs.
- **Help Desks and Processing Centers**
Communicating with end users of a help desk enables EPA to receive feedback on how they are performing. Was their ticket resolved in a timely manner? What necessitated the call to the help desk? Understanding the use of the help desk will aid EPA in adding to the resources available to users of an EPA system. The results can be used to expand a frequently asked questions page, or reorganize a page to make a sought after feature more prominent.
- **Focus Groups**
While many EPA offerings are available online, it remains important to continue engaging the public through in-person interaction. Gathering customer service feedback through focus groups and small discussion groups allows participants to personally interact with EPA staff. This personal interaction ensures that EPA can take in comments from the community, whether or not they are online. One example of an EPA customer service satisfaction focus group was when a nonprofit organization who is a recipient of an EPA cooperative agreement, gave EPA-required training on pesticide safety to agricultural workers. The nonprofit convened a focus group of agricultural workers to make sure the training materials made sense. It was important to have this feedback because EPA regulations require that training is delivered "in a manner they understand". EPA and the nonprofit organization recognize that cultural and language barriers play an important part in the farmworkers' ability to understand the lessons. The feedback enabled the nonprofit to tailor the messages and accompanying visuals to suit the audience.

In another example, an EPA contractor conducted focus group sessions on scripts for radio public service announcements aimed at farmworkers and pesticide handlers on how to work safely with and around pesticides. The focus group enabled the contractor and EPA to avoid culturally-inappropriate messaging that would not have been obvious otherwise. (Attached is the OMB-approved focus group document, with questions and moderator's guide.)

These examples demonstrate that focus groups are essential to EPA's ability to communicate with nontraditional audiences in an appropriate and effective manner.

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

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

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 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.

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 September 19, 2017, a 60-day notice for public comment was published in the *Federal Register* (82 FR 33908). The Agency received no comments in response to the 60-day notice.

9. Payment or Gift

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and usability studies are the exceptions.

In the case of in-person 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.

10. Confidentiality

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.

11. Sensitive Nature

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

12. Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested are 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 Survey	120,000	1	0.25	30,000

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$18,000 annually. These costs are comprised of: support staff and contractor payments.

15. Reason for Change

Adjustment. We have increased the burden hours by 10,000, which reflects the increased use of the generic clearance that we have seen over the past few years.

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.