Request for Approval under the "Generic Clearance for the Collection of Routine Customer Feedback" (OMB Control Number: 2010-0042)

TITLE OF INFORMATION COLLECTION: User Testing for e-Manifest System Deployment and Operation

PURPOSE:

The purpose of the usability testing is to ascertain how real users interact with the RCRAInfo e-Manifest module so that EPA can improve it based on user feedback. EPA will conduct user testing before the June 30, 2018, system launch date. EPA will also conduct user testing after the system launch date for future enhancement purposes. Test users generally will have very limited knowledge or understanding of the system, particularly before the system launch date. User testing enables EPA to: (1) determine whether the e-Manifest module satisfies the tester's expectations; (2) evaluate whether navigation and interaction with the system is highly intuitive and matches the tester's mental model of how the system should perform; and (3) identify other potential usability issues prior to and after system launch.

DESCRIPTION OF RESPONDENTS:

There are four categories of respondents that will participate in the usability testing:

- Hazardous waste generators sites that generate hazardous waste and ship it offsite.
- Brokers entities who have a contractual relationship with hazardous waste generators to arrange the logistics and routing of hazardous waste shipments and prepare manifests onbehalf-of their generator clients.
- Hazardous waste transporters entities that transport hazardous waste on public roads.
- Receiving Facilities facilities that receive offsite shipments for management and disposal.

TYPE OF COLLECTION	:	(Check one)
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[] Customer Comment Card/Complaint Form	[] Customer Satisfaction Survey
[X] Usability Testing (e.g., Website or Software)	[] Small Discussion Group
[] Focus Group	[] Other:

CERTIFICATION:

I certify the following to be true:

- 1. The collection is voluntary.
- 2. The collection is low-burden for respondents and low-cost for the Federal Government.
- 3. The collection is non-controversial and does <u>not</u> raise issues of concern to other federal agencies.
- 4. The results are <u>not</u> intended to be disseminated to the public.
- 5. Information gathered will not be used for the purpose of <u>substantially</u> informing <u>influential</u> policy decisions.
- 6. The 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 future.

Name: Stephen Donnelly, OLEM/ORCR/PIID

To assist review, please provide answers to the following question:

Personally Identifiable Information:

- 1. Is personally identifiable information (PII) collected? [] Yes [X] No
- 2. If Yes, is the information that will be collected included in records that are subject to the Privacy Act of 1974? [] Yes [X] No
- 3. If Applicable, has a System or Records Notice been published? [] Yes [] No Not applicable.

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? [] Yes [X] No

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Private Sector	198 x 3 yrs = 594	60 min/response	594
7=Totals	594	60	594

FEDERAL COST: The estimated weighted cost to the Federal government is \$212,552 for 3 years and \$70,850 annually. EPA estimates an average hourly Agency labor cost of \$57.11 for technical staff. This rate was taken from the RIA for the User Fee Final Rule. EPA also estimates an average hourly contractor cost of \$140.

Federal costs = (594 users)(0.25)(3 hours)(\$57.11) + (594 users)(0.75)(3 hrs)(\$140) = \$212,552 for 3 years and \$70,850 annually.

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents and do you have a sampling plan for selecting from this universe?

[] Yes [X] No

If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

EPA will solicit volunteers for user testing via email to subscribers of the e-Manifest and e-Manifest Development Listserv. There are currently 1652 and 359 subscribers to the e-Manifest Listserv and the e-Manifest Development Listserv, respectively. EPA will solicit volunteers who best represent the hazardous waste management industry and have experience in generating, transporting, receiving and managing, or processing manifests. These representatives also will have been involved in multi-state shipping activities, interact with the entire range of waste handlers on manifest-related issues, and stay abreast of industry manifesting practices and

burdens. As such, the volunteers can speak knowledgeably about the respective activities and burdens of small and large generators, brokers, transporters, and TSDFs.

Administration of the Instrument

1.	How will you collect the information? (Check all that apply)
	[X] Web-based or other forms of Social Media
	[X] Telephone
	[X] In-person
	[] Mail
	[] Other, Explain
2.	Will interviewers or facilitators be used? [X] Yes [] No

Please make sure that all instruments, instructions, and scripts are submitted with the request.

EPA will not use scripts during one-on-one or open test sessions. Users will test various aspects of the system by using data from their existing company manifests or from data contained in the system. EPA will instruct users to log in the e-Manifest pre-production module, select their site, and create a new manifest using their manifest or system data. EPA will observe users' interaction with the system and ask users to explain their user experience in real-time. EPA staff will only interrupt or briefly stop the testing session if the user is experiencing difficulties with the system and needs assistance. EPA will also conduct open testing. Open testers will log in to WebEx, and EPA will observe users creating manifests over the computer. EPA will also observe the user's interaction with other aspects of the system. Following the test session, EPA will provide users a survey (see survey attachment) and ask the user to rate their experience. The survey enables EPA to create its System Usability Scores and improve the system accordingly.