

SUPPORTING STATEMENT

Part A

Renewal of Generic Clearance for the Collection of Qualitative Feedback on
Agency Service Delivery

Date: 11/16/2017

United States Access Board

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Orders 12862 and 13571 direct 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 U.S. Access Board (hereafter, "Access Board") seeks renewal of its existing generic clearance to collect qualitative feedback on agency 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 Access Board 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 Access Board'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 Access Board 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 and efficiency of service delivery, satisfaction with agency programs or delivery of services, and resolution of service-related complaints or problems. 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 Access Board's programs and services will be unavailable.

The Access Board will only submit a collection for approval under this renewed 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 Item 16 (below) will be followed);

- Information gathered will not be used for the purpose of substantially informing influential policy decisions¹;
- 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
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained beyond applicable Federal record retention schedules, if any.

If these conditions are not met, the Access Board will instead 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 renewed generic clearance, a collection request will be submitted to OMB on a standardized form, 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 renewed 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)

The Access Board will designate an agency official to manage this renewed generic clearance and he or she will conduct an independent review of each proposed information collection to ensure compliance with the terms of this clearance prior to its submission to OMB.

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.”

3. Consideration Given to Information Technology

If appropriate, the Access Board 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 Access Board 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 Access Board will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, or using short, easy-to-complete information collection instruments.

6. Consequences of Not Conducting Collection

Without these types of feedback, the Access Board 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 C.F.R. § 1320.8(d), on August 10, 2017, a 60-day notice for public comment was published in the *Federal Register*. No comments were received.]

9. Payment or Gift

The Access Board does not anticipate providing payment or other forms of remuneration to respondents of its various forms of collecting feedback.

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, the Access Board 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 (258) are based on the estimated number of responses we expect to receive annually from collections conducted under our renewed generic clearance. This is an increase of about 150 burden hours annually as compared to our current generic clearance, primarily because we expect to solicit feedback from customers across a broader spectrum of agency programs and services than in years past.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Average Response Time (min)	Total Hours
Customer Feedback Survey: Training/Webinar	1,200	1	6	120
Customer Feedback Survey: Technical Assistance	2,700	1	3	135
Customer Feedback Survey: Compliance & Enforcement	40	1	4	3
Totals:	3,940	n/a	n/a	258

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

We do not anticipate any costs to the Federal government attributable to information collections under our renewed generic clearance other than modest staff time for development and administration of surveys, and analysis of results.

15. Reason for Change

Not applicable. This is a new request for renewal of a generic clearance.

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 Access Board 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 Access Board will disseminate its findings, when appropriate, in compliance with the agency's publicly posted guidelines for ensuring the quality of information disseminated to the public (www.access-board.gov/the-board/policies/information-quality). Any such release will also include specific discussion of the limitations of the qualitative results.

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 C.FR. § 1320.9.