

# **SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION**

## **Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery OMB # 1405-0193**

### **A. JUSTIFICATION**

1. 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 Department of State 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 State Department to gather 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 Department'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 Department of State and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. 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 Department 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 Department's services will be unavailable.

The Department of State will only submit a collection for approval under this generic clearance if it meets the following conditions:

- o 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);
- o Information gathered will not be used for the purpose of substantially informing influential policy decisions <sup>1</sup>;
- o 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;
- o The collections are voluntary;
- o 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;
- o The collections are non-controversial and do not raise issues of concern to other Federal agencies;
- o 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
- o 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 Department 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 and collection instruments. 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:

- o Customer comment cards/complaint forms
- o Small discussion groups
- o Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- o Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- o Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
- o In-person observation testing (e.g., website or software usability tests)

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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."

3. If appropriate, the Department will collect information electronically and/or use online collaboration tools to reduce burden.
4. No similar data are gathered or maintained or are available from other sources known to the Department.
5. Small business or other small entities may be involved in these efforts but the Department will minimize the burden on them for information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.
6. Without these types of feedback, the Department will not have timely information to adjust its services to meet customer needs.
7. There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.
8. A 60-day notice for public comment was published in the *Federal Register* on February 17, 2017 (82 FR 11099). Two comments were received that were not substantive in context to the information collection. Therefore, no changes will be made.
9. The Department will not provide payment or other forms of remuneration to respondents of its various methods of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the Department may provide stipends of up to \$40. In the case of in-person focus groups, the Department 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 Department plans to offer non-standard stipends, we will provide OMB with additional justifications in the request for clearance of these specific activities.

10. If a confidentiality pledge is deemed useful and feasible, the Department 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 or with authorized persons in accordance with whistleblower provisions. If a collection includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.
11. No questions will be asked that are of a personal or sensitive nature.

12. A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (18,958) are based on the number of collections we expect to conduct over the requested period for this clearance and their individual response times.

The annual hour cost burden is estimated to be \$633,197 based on the BLS tables of average wages for “all occupations” (\$23.86 x 1.4 weighted wage multiplier (\$33.40) x number of annual burden hours (18,958).

Estimated Annual Reporting Burden						
Type of Collection	No. of Respondents	Annual Frequency per Response	Avg. Hours per Response	Total Annual Hours	3 Year Total Hours	Cost to Government
Customer Satisfaction Surveys	325,000	1	3.5 minutes	18,958	56,874	\$500,000

13. There are no costs to respondents.

14. The anticipated cost to the Federal Government for this collection is estimated to be \$500,000. These administrative costs include one office staff member using approximately 1% of their time to review and process materials. Costs also include publishing, printing, web support, and management review.

15. The changes in burden hours increased from 8750 to 18,958 because of the increased number of respondents of 150,000 to 325,000 responding to qualitative feedback surveys. Also, the annual hours of 18,958 requested for this submission, is different from the last submission’s annual hours of 26,250. The difference is due to the calculation of totals over three years versus over one year.

16. 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 Department of State does not intend to publish its findings, we may receive requests to release the information (e.g., congressional inquiry, Freedom of Information

Act requests). The Department 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. The OMB expiration date will be displayed on each collection instrument.
18. The Department is not seeking exceptions to the certification statement.