



Independent Statistics & Analysis
U.S. Energy Information
Administration

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

Part A: Justification

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Introduction

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy (DOE). It collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding regarding energy and its interaction with the economy and the environment. EIA is required to publish, and otherwise make available independent, high-quality statistical data to federal government agencies, state and local governments, the energy industry, researchers, and the general public. This information collection requests a three-year extension of its Generic Information Collection Request (Generic ICR): “Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery” under OMB Control No. 1905-0210. As part of a Federal Government-wide effort to streamline the process to seek feedback from the public on service delivery, this generic clearance enables EIA to collect customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to ensure that our programs are effective, meet our customers’ needs, and receive feedback on improving service delivery to the public.

EIA requests a three-year extension with changes to the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery under OMB Control Number 1905-0210.

A.1. Legal Justification

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 U.S. Energy Information Administration (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, known within EIA as “Fast Track,” 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.

A.2. Needs and Uses of Data

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:

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."

- 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 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 Technology

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

A.4. Efforts to Identify Duplication

No similar data are gathered or maintained by the Agency or are available from other sources known to the Agency.

A.5. Provisions for Reducing Burden on Small Businesses

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 Less-Frequent Reporting

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

A.7. Compliance with 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. Summary of Consultations Outside of the Agency

In accordance with 5 C.F.R. 1320.8(d), a 60-day notice for public comment was published in the *Federal Register* at 82 Fed. Reg. 48807 (10/20/2017). There were no comments to the 60-day Federal Register notice.

A.9. Payments or Gifts 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.

A.10. Provisions for Protection of Information

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.

A.12. Estimate of Respondent Burden Hours and Cost

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. The total burden hours requested is 25,340 and 241,800 responses are based on the number of collections we expect to conduct over the requested three year approval period for this clearance.

Total number of unduplicated respondents (over the three year approval period): 241,800

Reports filed per person: 1

Total annual responses: $241,800/3 = 80,600$

Total annual burden hours: 8,446

Average Annual Burden ($8,446/80,600$)

Per Activity, Respondent: approximately 6.3 minutes

Table A1. Estimated Respondent Burden

Type of Collection	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
Usability testing	1	300	300	0.49	146
Customer Satisfaction Studies	1	80,000	80,000	0.10	8,000
Focus Groups	1	300	300	1.00	300
TOTAL		80,600	80,600		8,446

The cost of burden hours to the respondents is estimated to be \$622,132 annually (8,446 burden hours times \$73.66 per hour). Other than the cost of burden hours, EIA estimates that there are no additional costs for generating, maintaining and providing the information.

A.13. Annual Cost to the Federal Government

The anticipated cost to the Federal Government is approximately \$43,459 annually. These costs are comprised of staff time associated with drafting research protocols, survey instruments, and identifying potential respondents, survey administration, analyzing survey results, and reporting findings.

Annual Cost to Federal Government		
Activity	Annual Hours	Annual Costs
• Develop Survey Instruments	240	\$17,678
• Administer Surveys/Protocols	50	\$3,683
• Analyze Results	300	\$22,098
• TOTALS	590	\$43,459

A.14. Changes in Burden

Table A2. Changes in Burden

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved)	Burden Hours Per Response (Requested)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
Fast Track Research	1	150,000	241,800	50,000	80,600	0.11	0.10	5,250	8,446	30,600	0	30,600	3,196	0	3,196
TOTAL		150,000	241,800	50,000	80,600			5,250	8,446	30,600	0	30,600	3,196	0	3,196

A.15. Reasons for Changes in Burden

The increase in the burden hour estimate from 5,250 hours to 25,340 hours (8,446 hours annually) reflects current growth in program needs and to correct an administrative error where 5,250 hours was entered into the ROCIS system instead of the correct number of 15,750 hours. The actual increase, if the data entry error had not occurred, would show from 15,750 hours to 25,340 hours. The growth in program needs is reflected by the increase in the number of customer satisfaction surveys from one in 2015 to nine in 2017. The number of responses used in some of those online surveys also increased and in one case the sample size exceeded 20,000 responses for a single customer satisfaction survey in 2017. Program offices are encouraged to use customer satisfaction surveys to show the practical utility and document the use and purpose of their survey data. The burden time is small for each response. The increase in responses from 150,000 to 241,800 and increase in burden hours from 5,250 to 25,340 are mainly due to the increased use of customer satisfaction surveys to understand how customers are using EIA survey data.

The weighted average annual burden per response remained the same at 6.3 minutes from the previous clearance. Although the annual number of respondents for focus group studies increased from 100 to 300, the annual number of responses for customer satisfaction surveys also increased from 50,000 to 80,600.

Table A3. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	241,800	91,800	0	150,000
Total Number of Burden hours (Hr)	25,340	20,090	0	5,250

A.16. Collection, Tabulation, and Publication 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.

A.17. OMB Number and Expiration Date

We are not requesting an exemption to the requirement for displaying an OMB Approval date.

A.18. Certification Statement

These activities comply with the requirements in 5 C.F.R. 1320.9.