

**Department of Transportation
Office of the Chief Information Officer**

**Supporting Statement Part A
Generic Information Collection Submissions for Generic Clearance for the
Collection of Qualitative Feedback on Agency Service Delivery**

INTRODUCTION

In accordance with the Paperwork Reduction Act of 1995, the Federal Motor Carrier Safety Administration (hereafter “the Agency”) announces its plan to submit the Information Collection Request (ICR) described below to the Office of Management and Budget (OMB) for its review and approval and invites public comment. The Agency requests approval to extend an existing ICR titled, “Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery,” which will expire on March 31, 2018. The Agency estimates the annual burden of the information collections to be 2,233 hours.

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 Agency seeks OMB approval to extend an existing 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 and 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. They 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. (Procedures outlined in Question 16 will be followed if information is to be released);
- 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

¹ As defined in OMB, as well as Department of Transportation, information quality guidelines, "influential" information 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" (67 FR 8460 (Feb. 22, 2002)).

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:

- 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 and opt-out web surveys); and
- 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. It 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, the Agency will collect information electronically and/or use online collaboration tools to reduce burden.

4. Duplication of Information

Information collections will be undertaken only when 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. 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 Collections

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), a 60-day notice (82 FR 37508) was published on August 10, 2017, with a 60-day comment period to announce this proposed information collection in the *Federal Register*. No comments were received.

The Agency published a notice in the Federal Register (83 FR 5508) on February 7, 2018, to announce that this ICR would be submitted to OMB for approval and requested comments from the public for 30-days.

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 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 will 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 2,232.5 annual burden hours requested are based on the number of collections the FMCSA expects to conduct over the requested period for this clearance.

Table 1. Annual Respondent and Burden Hour Estimates

| Form | Number of Respondents | Number of Responses per Respondent | Burden per Response (minutes) | Total Annual Burden (hours) |
|---|-----------------------|------------------------------------|-------------------------------|-----------------------------|
| ART Forum Topic Selection | 120 | 1 | 10 | 20 |
| ART Forum Evaluation (paper-based) | 25 | 1 | 15 | 6.25 |
| ART Forum Evaluation (web-based) | 25 | 1 | 15 | 6.25 |
| Customer Satisfaction (web pages and web-enabled resources) | 6,000 | 1 | 5 | 500 |
| Customer Satisfaction (technical guidance products) | 1,000 | 4 | 15 | 1,000 |
| Customer Satisfaction (products and services) | 1,500 | 1 | 20 | 500 |
| Research & Technology (R&T) Activity Effectiveness | 200 | 1 | 30 | 100 |
| R&T Website Use and Satisfaction | 400 | 1 | 15 | 100 |
| Annual Total | 9,270 | 12,270 | | 2,232.5 |

13. Costs to Respondents

Mail surveys are being discontinued therefore respondents will not incur any non-hour costs. Also, there are no record keeping costs or fees associated with the collections in this ICR.

14. Costs to Federal Government

FMCSA estimates the total dollar value of the annual burden hours for this collection to be \$137,076. These costs are comprised of estimated contractor costs that are necessary to collect the information under this generic clearance. A breakdown of this cost is provided in Table 2 below:

Table 2. Total Estimated Annualized Costs

| Type of Collections | Estimated Costs |
|---|-----------------|
| ART Forum Topic Selection | \$662 |
| ART Forum Evaluation (paper-based) | \$207 |
| ART Forum Evaluation (Web-based) | \$207 |
| Customer Satisfaction (web pages and web-enabled resources) | \$30,000 |
| Customer Satisfaction (technical guidance products) | \$45,000 |
| Customer Satisfaction (products and services) | \$1,000 |
| R&T Activity Effectiveness | \$44,800 |
| R&T Website Use and Satisfaction | \$16,000 |
| Annual Total | \$137,076 |

15. Reason for Change

The total annual burden hours being requested for this renewal is 2,233 hours. This is a decrease from the previously requested 3,450 annualized hours (which is 10,350 hours over a 3-year period). The total hours over a 3-year period, 10,350 hours, was inadvertently requested in the previous ICR renewal. The difference between the hours of the renewal request and the previously OMB approved request is due to the discontinuance of the Customer Satisfaction Survey (outreach materials) and the addition of the annual ART Forum Topic Selection and Art Forum Evaluation (using paper-based and web-based means) surveys. There is also a decrease of 39,030 responses (51,300 previously approved responses - 12,270 current renewal responses).

Additionally, there is a decrease in the non-hour costs of \$1,470 in costs to respondents. This is a result of the discontinuance of mailing surveys. With the ICR renewal, respondents will not incur any non-hour costs. The expected annual cost to the Federal Government decreased from \$200,800 annually to \$137,076, due to the estimated cost difference in the discontinuation of the Customer Satisfaction Survey and implementation of the ART Forum contracts.

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 or Freedom of Information Act requests). The Agency will disseminate the findings when appropriate, strictly following the Agency's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated to the Public by the Department of Transportation," 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

No exceptions to the certification statement are requested.