

**Supporting Statement for Paperwork Reduction Act Generic Information Collection
Submissions for “Generic Clearance for the Collection of Qualitative Feedback on
Agency Service Delivery”**

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 Merit Systems Protection Board (MSPB) seeks an extension, without change, of a currently approved Information Collection Request. 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 MSPB to obtain 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 MSPB’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 MSPB 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. MSPB 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 MSPB’s services will not be available.

MSPB will only submit a collection for approval under this generic clearance if it meets the following conditions:¹

- 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.²
- 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;
- The collections are targeted to solicit the opinions of respondents who have already experienced, or may experience in the future, an MSPB program; and,
- Personally identifiable information (PII) is collected only to the extent necessary, such as when needed to provide remuneration for participants of focus groups and cognitive laboratory studies and is not retained.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with any 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:

- 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 or opt-out web surveys).
- In-person observation testing (e.g., website or software usability tests).

¹ If these conditions are not met, MSPB will submit an information collection request to the Office of Management and Budget (OMB) for approval through the normal Paperwork Reduction Act (PRA) process.

² 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.”

MSPB 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.

3. Consideration Given to Information Technology

If appropriate, MSPB 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 MSPB or are available from other sources known to MSPB.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts; however, MSPB will minimize their burden by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Consequences of Not Conducting Collection

Without these types of feedback, MSPB 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 Federal Register Notice inviting public comments was published on January 19, 2018, 83 FR 2821.

9. Payment or Gift

MSPB will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

10. Confidentiality

MSPB does not anticipate needing to include a pledge of confidentiality. However, if such a pledge is needed, a citation for the statute or regulation authorizing the pledge will be included.

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 hour figure requested (1,500) is based on the number of collections we expect to conduct over the requested period for this clearance.

Type of Collection	Number of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Qualitative Survey	3,000	One per request	0.5	1,500

With the estimated annual burden of 1,500 hours, the overall annual labor cost for respondents is estimated to be approximately \$50,100. To calculate this figure, we begin with an hourly wage of \$23.86, which is the Department of Labor’s May 2016 Occupational Employment Statistics mean hourly wage for “All Occupations.”³ We have multiplied this hourly wage by a factor of 1.4 to include benefits, yielding an hourly rate of \$33.40. This figure, multiplied by the estimated 1,500 hours per year, yields a cost burden to the public of \$50,100.

Type of Respondent	Total Burden Hours (Annual)	Average Hourly Wage – DOL May 2016 (00-0000 “All Occupations”)	Total Respondent Costs (Annual)
Target Population: Lawyers	1,500	\$33.40/hour	\$50,100

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$36,733 annually. These costs are comprised of:

1. Professional staff time designing, reviewing, programming survey instruments, coordinating participant contacts, and distributing surveys, recording and

³ This data is available at https://www.bls.gov/oes/current/oes_nat.htm#00-0000.

checking results, analyzing results, presenting or reporting results total \$36,733 per year.

2. MSPB will utilize free survey services, such as Survey Monkey.

Activity	Pay Grade (2017 Washington locality)	% of Time Annually	Cost
Survey distribution, participant coordination, administrative matters	GS 12-1: \$79,720	25%	\$19,930
Instrument development and analysis	GS 14-1: \$112,021	15%	\$16,803
Total	N/A	N/A	\$36,733

15. Reason for Change

Not applicable. This is a request for an extension, without change, of a currently approved generic Information Collection Request.

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 MSPB does not intend to publish its findings, we may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). MSPB will disseminate the findings when appropriate.

17. Display of OMB Approval Date

We are not requesting an exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.