

National Credit Union Administration
SUPPORTING STATEMENT

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

**OMB No. 3133-0188
PART A**

A. JUSTIFICATION

1. Circumstances that make 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 National Credit Union Administration (NCUA), seeks to obtain OMB approval of its 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 NCUA 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 NCUA'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 NCUA 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. NCUA 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 NCUA's services will be unavailable.

NCUA 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;
- 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, NCUA 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:

- 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); and

- Usability testing (e.g., website or software usability tests).

NCUA 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.

To the extent feasible, NCUA 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 NCUA or are available from other sources known to NCUA.

5. Effect to reduce burden on small entities.

Small businesses or other small entities may be involved in these efforts. The burden on these entities as a result of the information collections approved under this clearance will be minimized by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Consequences of not conducting the information.

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

7. Inconsistencies with guidelines in 5 CFR 1320.5(d)(2).

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. Efforts to consult with persons outside the Agency.

In accordance with 5 CFR 1320.8(d), a 60-day notice was published in the *Federal Register* on May 14, 2018, at 83 FR 22292, soliciting comments. No public comments were received.

9. Payment or gift to respondents.

NCUA 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 exception.

In the case of in-person cognitive laboratory and usability studies, the NCUA may provide stipends of up to \$40. In the case of in-person focus groups, NCUA 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, NCUA will provide OMB with additional justification in the request for clearance of these specific activities.

10. Assurance of confidentiality.

The NCUA does not intend to maintain any personal identifiable information. When deemed useful and feasible, the NCUA will include a pledge of anonymity that is supported by statutory or regulatory authority or by disclosure and data security policies that are consistent with the pledge. If the NCUA includes a pledge of anonymity, it will include a citation for the statute or regulation supporting the pledge.

11. Questions of a sensitive nature.

No questions will be asked that are of a sensitive nature are asked.

12. Burden of information collection.

A variety of instruments and platforms will be used to collect feedback from respondents. The annual burden hours (14,000) are based on the number of collections we expect to conduct over the requested period for this clearance.

Type of Collection	No. of Respondents	Hours per Response	Total Hours
Customer Feedback	53,000	0.5	26,500
Focus and Small Discussion Groups	600	3	1800
Usability Testing	2,000	6.25	12500
Improve Service Delivery	400	3	1200
Total	56,000		42,000

13. Capital start-up or on-going operation and maintenance costs.

There are no costs anticipated for this collection.

14. Annualized costs to Federal Government.

The anticipated cost to the Federal Government is approximately \$160,000 annually. These costs are comprised of: (e.g., equipment, overhead, printing, postage and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance.

15. Changes in burden.

There has been a reduction of 715 hours from the previously approved burden. This is due to an adjustment in the number or estimated respondents.

16. Information collection planned for statistical purposes.

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 NCUA does not intend to publish its findings, NCUA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests) and, if so, will follow the requirements under those rules.

17. Request non-display the expiration date of the OMB control number.

The display of the date of expiration of the OMB approval may be confusing to respondents. This date may be confused with a due to date of a particular collection instrument. A non-display of this date is requested.

18. Exceptions to certification for Paperwork Reduction Act submissions.

These activities comply with the requirements in 5 CFR 1320.9.