

Supporting Statement A

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NINR)
OMB Number: 0925-0653, Expiration Date: 4/30/2018

Date: July 12, 2018

Check off which applies:

- New
- Revision
- Reinstatement with Change
- Reinstatement without Change
- Extension
- Emergency
- Existing

Federal Government Employee Information:

Name: Diana Finegold, MSPH

Address: Building 31, Suite 5B03, 31 Center Drive, Bethesda, MD 20892

Telephone: (301) 496-0209

Fax: (301) 480-4969

Email: diana.finegold@nih.gov

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Attachments

Attachment A: List of Sub-Studies Previously Approved under OMB Number: 0925-0653, Expiration Date: 4/30/2018

Attachment B: sub-study template

A. JUSTIFICATION

This is a reinstatement without change to the previously approved submission. There are no changes being requested for this submission. The information collection activity has garnered qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with the Administration's commitment to improving service delivery. This generic has provided information about the National Institute of Nursing Research's (NINR) 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. It has also allowed feedback to contribute directly to the improvement of program management. Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population.

A.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 National Institute of Nursing Research of the National Institutes of Health (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 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. This generic clearance is a vital vehicle for speedy reviews of simple information collections, and for this reason it is important this information collection continues.

A.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 (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 certain 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 focus group guide). 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)

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."

There have been four projects approved under this generic clearance since its approval three years ago, all contributing significantly to the mission of NINR. The projects included customer feedback surveys, individual interviews, and focus groups. Attachment A is a list of all sub-studies previously approved under OMB Number: 0925-0653.

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 Information Technology and Burden Reduction

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

A.4 Efforts to Identify Duplication and Use of Similar Information

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

A.5 Impact on Small Businesses or Other Small Entities

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 Collecting the Information Less Frequently

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

A.7 Special Circumstances Relating to the Guidelines of 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 Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

As required by 5 CFR 1320, a 60-day notice of this proposed data collection was published in the Federal Register, Volume 83, Pages 10734-10736 on March 12, 2018, and allowed 60-days for public comment. No public comments were received.

NINR will use routine contacts with customers and partners and other qualitative information collection activities to identify areas of interest and concern to customers. NINR will utilize in-house staff with expertise in statistics and may use the staff of contractors in developing survey plans. Additional support may be sought from outside experts to help in design and implementation of the surveys.

A.9 Explanation of Any Payment or Gift to Respondents

It is possible that some information collection activities will entail small payments or gifts to respondents. Small amounts of money, a free meal or snack scheduled around the time of the pretest, and/or remuneration for parking and/or transportation are most often used, particularly when recruiting hard-to-reach and minority respondents.

Instances for offering an incentive will be determined on a case-by-case basis (depending on the particular information collection design). The following are the kinds of situations for which respondents may be paid or given a gift:

- Health care providers who participate in a survey on their opinions about the relevance of materials for their patients may receive a small payment (e.g. \$25).
- Individuals who participate in in-person focus groups may receive an honorarium (e.g. \$50-75) to cover their time, transportation costs, and childcare expenses.
- Health educators who support the acquisition of data related to customer satisfaction with specific educational programs and products may be able to request and receive certain quantities of materials that exceed the limits usually established for those materials.

Circumstances, however, do not always require that remuneration be given; many audiences including the public, patients, and other health professionals often participate gratis because of their interest or involvement in the topic, or as a professional courtesy.

A.10 Assurance of Confidentiality Provided to Respondents

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.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (500) are based on the number of collections we expect to conduct over the

requested period for this clearance.

Table 12-1 Estimated Annualized Burden Hours

Form Name	Type of Respondents	Number of Respondents	Number of Responses per Respondent	Average Burden Per Response (in hours)	Total Annual Burden Hours
A	General Public	500	1	30/60	250
B	Health Professionals	300	1	30/60	150
C	Educators	200	1	15/60	50
D	Students	200	1	15/60	50
Total		1,200	1,200		500

A.12.2 Annual Cost to Respondent

Table 12-2 Annualized Cost to Respondents

Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
General Public	500	\$24.34	\$12,170.00
Health Professionals	300	\$38.83	\$11,649.00
Educators	200	\$26.67	\$5,334.00
Students	200	n/a	
Total	1,200		\$29,153.00

* National Bureau of Labor Statistics. https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000 accessed on April 30, 2018.

General Public wage rate was obtained from https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000 accessed on April 30, 2018.

Health Professionals wage rate was obtained from <https://www.bls.gov/oes/2017/may/oes290000.htm> accessed on April 30, 2018. Occupation title “29-0000 Healthcare Practitioners and Technical Occupations (Major Group)”

Educators wage rate was obtained from <https://www.bls.gov/oes/2017/may/oes250000.htm> accessed on April 30, 2018. Occupation title “25-0000 Education, Training, and Library Occupations (Major Group)”

A.13 Estimate of Other Total Annual Cost Burden to Respondents and Record Keepers

No costs are anticipated.

A.14 Annualized Cost to the Federal Government

The anticipated cost to the Federal Government is approximately \$42,078 annually. These costs are comprised of salaries of Federal and contract staff who plan, recruit, schedule, conduct and analyze the outcomes of information collection activities. These anticipated annualized costs are shown in the following table.

Cost Descriptions	Grade/Step	Salary**	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
Branch Chief	GS-14/5	\$129,869	5%		\$6,493
Health Communications Specialist	GS-12/5	\$92,421	10%		\$9,242
Contractor Cost					
Project Manager	n/a	\$169,328	5%		\$8,466
Communications Associate	n/a	\$90,946	10%		\$9,095
Senior Digital Analyst	n/a	\$139,630	5%		\$6,982
Travel (mainly local travel)					\$300
Operational Costs for Data Collection Activities (e.g., printing, postage, equipment), non-labor					\$1,500
Total					\$42,078

** <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB.pdf>

A.15 Explanation for Program Changes or Adjustments

This is a request for a reinstatement without change to the previously approved submission (0925-0653). There are no changes to the purpose/scope of this submission from the previously approved

submission. The annual burden hours have been decreased from 1,025 to 500 to more accurately reflect anticipated usage.

A.16 Plans for Tabulation and Publication and Project Time Schedule

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.

While the primary purpose of all studies is to provide information to the developers of the messages/materials/services for the purpose of improving them, NINR shares information internally and also makes results available to a variety of health educators at Government agencies, voluntary organizations, health professional organizations, and medical institutions. Information collected will be compiled and presented in reports and briefings for staff from OCPL and other divisions within NINR and NIH. Reports will include information regarding respondent demographics, comparisons across demographic and customer subgroups, and recommendations for improving programs and campaigns.

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

No exemption is requested. All forms will display the OMB number and expiration date.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.