

U. S. OFFICE OF GOVERNMENT ETHICS
REVISED SUPPORTING STATEMENT FOR FAST TRACK GENERIC CLEARANCE FOR THE
COLLECTION OF QUALITATIVE FEEDBACK ON AGENCY SERVICE DELIVERY
SEPTEMBER 2018

A. Justification

1.-2. Explain the circumstances that make the collection of information necessary. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Executive Order 12862 (Sept. 11, 1993) directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to ensure that the agency is effective and meeting our users' needs, the U.S. Office of Government Ethics (OGE) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our products and services. If this information is not collected, vital feedback from stakeholders on the agency's services will be unavailable.

OGE expects to use various methods (e.g., focus groups, satisfaction surveys, comment cards) to solicit feedback. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public and other agency stakeholders. This feedback will provide insights into stakeholder perceptions, experiences, and expectations, provide an early warning of issues with service, and 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 stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

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

- 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 noncontroversial;
- The collections are focused on the awareness, understanding, attitudes, preferences, or experiences of the public or other stakeholders in order to improve existing or future services, products, or communication materials;
- Personally identifiable information (PII) is collected only to the extent necessary;
- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release to the public;

- Information gathered will not be used for the purpose of substantially informing influential policy decisions; and
- 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.

If these conditions are not met, OGE 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 new generic information collection will be submitted to OMB along with supporting documentation (e.g., a copy of the comment card). Under OMB's Fast Track Process, approval will be automatically granted within five business days from receipt unless OMB raises concerns.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

If appropriate, OGE will collect information electronically and/or use online collaboration tools to reduce burden. For example, website feedback surveys would be collected electronically. OGE attempts to collect and manage information electronically whenever possible in order to reduce the burden on the public and its other stakeholders, as well as for administrative efficiency.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

No similar information is gathered or maintained by OGE or is available from other sources known to OGE.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

It is unlikely that small businesses or other small entities will be involved in these efforts. OGE will minimize burden resulting from information collections approved under this clearance through sampling, asking for readily-available information, and using short, easy-to-complete information collection instruments.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing the burden.

If this information is not collected, vital feedback from stakeholders on the agency's services will be unavailable, and OGE will not have timely information to adjust its services to meet stakeholder needs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than 3 years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secrets or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

No such special circumstances exist.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

OGE published a first round *Federal Register* notice soliciting comments on this information collection on April 12, 2018. *See* 83 FR 15837-15838. OGE did not receive any comments in response. OGE published a second round *Federal Register* notice soliciting comments to be directed to OMB on July 19, 2018. *See* 83 FR 34134-34135.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Not applicable. Respondents receive no payments or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

If a confidentiality pledge is deemed useful and feasible, OGE 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 consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If OGE includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

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

12. Provide estimates of the hour burden of the collection of information.

OGE estimates an average of approximately 45,425 responses each year for the next three years, totaling an estimated 1,900 burden hours for all three types of anticipated activities. This was calculated based on the anticipated number of respondents to small discussion groups, feedback surveys, and website surveys, which are the types of collections covered under this generic clearance.

Based on industry web survey response rates, 15% of OGE website visitors (300,000 total visitors over the past year) are estimated to be respondents to web surveys, which would be an average of 45,000 respondents each year. The average time per response is estimated to be 2 minutes, which means the annual burden hours is estimated to be 1,500 hours.

With regard to small discussion groups, OGE estimates an average of about 5 activities a year with an average of 25 participants each, which equals an average of about 125 responses a year. The average time per response is estimated to be 180 minutes, which means the annual burden hours is estimated to be 375 hours.

With regard to in-person feedback surveys, OGE estimates an average of about 25 activities a year with an average of 12 participants each, which equals an average of about 300 responses a year. The average time per response is estimated to be 5 minutes, which means the annual burden hours is estimated to be 25 hours.

The frequency for all of these information collections will be occasional.

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.

No costs are anticipated.

14. Provide an estimate of annualized costs to the Federal Government.

No additional expenses that would not have been incurred without this collection of information are anticipated.

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14.

Not applicable.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to any larger populations. Findings will be used for general service improvement and are not for publication or other public release.

Although OGE does not intend to publish its findings, OGE may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). OGE will disseminate the findings when appropriate, strictly following OMB's "Standards and Guidelines for Statistical Surveys", and will include specific discussion of the limitation of the qualitative results discussed above.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

OGE is requesting no exemption.

18. Explain each exception to the topics of the certification statement identified in Certification for Paperwork Reduction Act Submissions.

Not applicable.

B. Collections of Information Employing Statistical Methods

Not applicable. This collection of information does not employ statistical methods.