

1 SUPPORTING STATEMENT B FOR PAPERWORK REDUCTION ACT SUBMISSION

DOI Programmatic Clearance for Customer Satisfaction Surveys OMB Control Number 1040-0001

Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," the following documentation should be included in Supporting Statement B to the extent that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Our potential respondent universe consists of DOI's customers. DOI defines the term "customer" in the following manner:

Customer: Anyone who uses DOI resources, products, or services. This includes internal customers (anyone within DOI) as well as external customers (e.g., the American public, representatives of the private sector, Tribes, academia, other government agencies). Depending upon their role in specific situations and interactions, citizens and DOI stakeholders and partners may also be considered customers.

We define "Stakeholder" to mean groups, individuals or Tribes who have an expressed interest in and who seek to influence the present and future state of DOI's resources, products, and services.

We define "Partners" to mean groups, individuals, Tribes and government agencies who are formally engaged in helping DOI accomplish its mission, or with whom DOI has a joint responsibility/mission.

Based on experience with the existing Programmatic Clearance, we estimate that there will be approximately 60,000 survey respondents, and 60,000 respondents submitting comment cards annually. Respondent types include coal operators, contractors/vendors, environmental groups, other governments (state, local, foreign), grant recipients, American Indians/Alaska Natives, industry groups, insular governments, interested publics (including community and specific-interest groups), law enforcement, mining companies, public information centers, scientific data users, universities/educators, utility companies, and visitors/recreationists.

Based on our experience with the existing Programmatic Clearance, we anticipate response rates at or above levels needed to obtain statistically viable results. We will take steps to

maximize response rates and ensure that these are integrated as part of the survey methodology in the supporting statement for each information collection to be considered under the clearance.

2. Describe the procedures for the collection of information including:

- * **Statistical methodology for stratification and sample selection,**
- * **Estimation procedure,**
- * **Degree of accuracy needed for the purpose described in the justification,**
- * **Unusual problems requiring specialized sampling procedures, and**
- * **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

N/A

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

N/A

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

All requests to collect information under the auspices of this proposed renewal will be carefully evaluated to ensure consistency with the intent, requirements, and boundaries of this programmatic clearance. Proposed collection instruments and procedures must comply with OMB guidance in "Guidance on Agency Survey and Statistical Information Collections (January 20, 2006)."

Program managers and investigators planning to submit information collection requests under this Programmatic Clearance are strongly encouraged to pretest any information collection instruments to be used. Further, we strongly encourage use of the Programmatic Clearance to obtain approval to conduct any pretesting that falls under the requirements of the Paperwork Reduction Act (i.e., more than nine individuals are being surveyed, etc.). In these cases, requests for approval to pretest surveys will be subject to the same requirements as a standard information collection.

Interior's Office of Policy Analysis will conduct an administrative review of each request and oversee technical reviews of each request to ensure statistical validity and soundness. All information collection instruments will be designed and deployed based upon acceptable statistical practices and sampling methodologies, where appropriate, and will be used to obtain consistent, valid data that are representative of the target populations, account for non-response bias, and achieve response rates at or above levels needed to obtain statistically useful results.

All submissions under the program of expedited approval must include a description of the

survey methodology. This description must be specific and describe, as appropriate, each of the following: (a) respondent universe, (b) the sampling plan and all sampling procedures, including how individual respondents will be selected, (c) how the instrument will be administered, (d) expected response rate and confidence, and (e) strategies for dealing with potential non-response bias. A description of any pre-testing and peer review of the methods and/or instrument is highly recommended. Further, all submissions under the Programmatic Clearance will describe how data will be presented to managers and any others that will use results of the surveys, particularly in cases where response rates were lower than anticipated. In these cases, program managers must take steps to ensure that the appropriate caveats and explanations are provided with data presentations and reports so that users of the data understand that there may be possible biases associated with the data.

Interior has established a clearance form (DI-4010) that program managers must complete for any submission under the DOI Programmatic Clearance for Customer Satisfaction Surveys. The form addresses all points mentioned above. This form and a detailed Guidelines Document explain the full process for submitting a specific instrument for expedited approval under this Programmatic Clearance. This form and the Guidelines Document are attached in ROCIS as part of this submission for an extension of OMB control number 1040-0001.

5. Provide the names and telephone numbers of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

Statistical aspects of this programmatic approval were reviewed by Benjamin Simon, Chief Economist, Department of the Interior, (202-208-4916).

DOI's Office of Policy Analysis (OPA), in concert with other statistical experts in DOI, will serve as the "secondary office of control," coordinating the customer research efforts of DOI and ensuring that statistical aspects of all surveys remain consistent with the programmatic approval. PPA will require that a qualified statistician review and approve each proposed information collection prior to submission of the collection to PPA. Further, PPA will require that the appropriate bureau/office Information Collection Clearance Officer review and approve the proposed information collection prior to submission of the collection to PPA. PPA will provide the final technical review at the Departmental level prior to submitting the specific information collection request to OMB for expedited approval.

Respective Interior bureau and office program managers, their contractors, and statistical staff will actually collect and analyze the information collected via surveys approved under this generic clearance.