

**Supporting Statement**  
**“Clearance for the Collection of Qualitative Feedback**  
**On Agency Service Delivery”**  
**United States Patent and Trademark Office**  
**OMB Control No. 0651-0080**

**A. JUSTIFICATION**

This is a request to extend OMB approval.

**1. Circumstances Making the Collection of Information Necessary**

Executive Order 12862 (<http://www.archives.gov/federal-register/executive-orders/pdf/12862.pdf>) 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 United States Patent and Trademark Office (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 is not in the form of statistical surveys that yield quantitative results that can be generalized to the population of study.

Collecting feedback will allow for the Agency to have a pulse on customer satisfaction and adjust where necessary to meet and exceed expectations. It provides for an ongoing, collaborative, and actionable communication between the Agency and its customers and stakeholders. It will enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving services. The information collected from our customers and stakeholders will help ensure that users have an opportunity to convey their experience with the Agency's programs. Doing so will also provide insights into customer or stakeholder perceptions, experiences, and expectations. Providing the Agency an ability to detect early signs of issues with services, and focusing attention on areas where communication, training, or changes in operations may be necessary. It also allows feedback to contribute directly to the improvement of program management.

**2. Purpose and Use of the Information Collection**

Improving Agency programs requires ongoing assessment. The Agency will collect, analyze, and interpret information gathered to identify strengths and weaknesses of current services. Based on feedback received, the Agency will identify operational changes needed to improve programs and services. 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. The Agency is committed to hearing feedback from its customers. Responses will be assessed to identify service areas in need of improvement. If this information is not collected, then the Agency will miss opportunities to obtain vital feedback from their customers and stakeholders on ways to improve their program and services.

- The collection is voluntary;
- The collection is 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 collection is noncontroversial and does 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;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
- Information gathered will only be used internally for general program and service improvement as well as program administrative purposes, and is not intended for release outside the Agency;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;
- and
- Information gathered will yield qualitative information; the collections are not designed or expected to yield statistically reliable results nor used as though the results are generalizable to the population of study.

As a general matter, these information collections will not result in any new system of records containing privacy information and will not ask questions of a sensitive nature.

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

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.

**3. Consideration Given to Information Technology**

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

**5. Reducing the Burden on 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.

**6. Consequences of Not Conducting Collection**

Without these types of feedback, the Agency 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 notice for public comment was published in the *Federal Register* on May 21, 2018 (FR 83 pg. 23428). No comments were received.

**9. Payment or Gift**

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups are the exceptions.

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

**10. Confidentiality**

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 and 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.

**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 hours requested are based on the number of collections we expect to conduct over the three-year renewal period.

IC Number	Information Collection Item	Estimated time for response (minutes) (a)	Estimated Annual Responses (b)	Estimated annual burden hours (a) x (b) = (c)	Rate (\$/hr) (d)	Total Cost (\$) (c) x (d) = (e)
1		5	40,000	3,333.33	\$204.33	\$681,100.00
2	Questionnaires/Customer Comment Cards/ Complaint Forms	5	600	50.00	\$204.33	\$10,216.50
3	Focus Groups/ Interviews	15	500	125.00	\$204.33	\$25,541.25
		120	400	800.00	\$204.33	\$163,464.00
5	Usability Tests (In-person observation (i.e., Website/ Software)	30	1,000	500.00	\$204.33	102,165.00
<b>Total (Three – Year Period)</b>	---	---	<b>42,500 (127,700)</b>	<b>4,808.33 (14,425)</b>	---	<b>\$982,486.75 (\$2,947,460.25)</b>

### 13. Costs to Respondents

There are no capital start-up, maintenance, postage, or recordkeeping costs associated with this information collection.

### 14. Costs to Federal Government

The anticipated cost to the Federal Government will be included with each submitted request. During the previous approval period, the average cost was \$8,331 per request.

### 15. Reason for Changes in Annual Burden

#### A. Changes in Collection since previous OMB approval in 2017

OMB previously approved a change worksheet for this information collection in May 2017. The current collection contains (for a three-year period):

- 87,200 responses
- 19,980 burden hours
- \$917,348.47 in respondent hourly cost burden
- \$0.00 in annual (non-hour) costs

#### Changes since the publication of the 60-day notice

Since the publication of the 60-day notice in the Federal Register on May 21, 2018 the following change has been made to this collection (for a three-year period):

- A decrease of 301,300 responses
- A decrease of 41,000 burden hours
- A decrease of \$8,377,530 in annual cost burden

These changes are a result of IC line 6 (ForeSee Surveys (USPTO.GOV)), which has been removed from this collection; those surveys will have their own generic clearance.

#### B. Changes proposed in this request to OMB

The proposed collection, as outlined in the tables above, seeks to modify the existing collection. The proposed collection contains an estimated (for a three-year period):

- 127,700 responses
- 14,425 burden hours
- \$2,947,460.25 in respondent hourly cost burden
- \$0 in annual (non-hour) costs

#### Change in Responses

The total responses for this collection have increased by 40,500 (from 87,200 to 127,700) from the previous approval of this collection in May 2017, due to estimates gathered from the number of Fast

Tracks approved over the past three years. The total time burden will decrease, however, due to the more prevalent use of electronic formats of information collection, which are quicker to use than paper formats. The time burden is estimated to decrease by 5,555 (from 19,980 to 14,425).

#### **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 the Agency does not intend to publish its findings, the Agency may receive requests to release the information (e.g., congressional inquiry or 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.

#### **17. Display of OMB Approval Date**

The agency will display the OMB approval date and burden information for each item within this collection.

#### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

These activities comply with the requirements in 5 CFR 1320.9.