

Supporting Statement A for

Generic Clearance to Conduct Voluntary Customer/Partner Surveys (NLM)

OMB Control #:0925-0476 Expiration Date: 09/30/2018

Date: September 21, 2018

Check off which applies:

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

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ATTACHMENTS:

Attachment 1 - NLM Generic Survey ICR

Attachment 2 - NLM Generic ICR survey instrument
Attachment 3 - NLM Mini-Supporting Statement Template
Attachment 4 - Listing of Approved ICRs

Generic Clearance to Conduct Voluntary Customer/Partner Surveys (NLM)

A. JUSTIFICATION

A.1 Circumstances Making the Collection of Information Necessary

This is a request that the Office of Management and Budget (OMB) approve, under the Paperwork Reduction Act, a **Reinstatement without Change** of generic clearance **OMB 0925-0476** for the National Library of Medicine (NLM) to conduct a number of customer satisfaction surveys to implement Executive Order 12862. This order directs federal agencies that provide significant services directly to the public to survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services. The order also requires future surveys to continually assess the level of customer satisfaction. The current OMB authorization to conduct surveys approved under this generic clearance will expire on September 30, 2018.

In addition to the Executive Order, the NLM is legislatively mandated by 42 USC 286 to assist the advancement of medical and related sciences and to aid the dissemination and exchange of scientific and other information important to the progress of medicine and to the public health. This mandate specifically directs the NLM to promote the use of computers and telecommunications by health professionals (including health professionals in rural areas) for the purpose of improving access to biomedical information for health care delivery and medical research.

In 1994, the NLM was designated a "Federal Reinvention Laboratory" with a major objective of improving its methods of delivering information to the public. At a minimum, necessary elements in improving the delivery of information include; (1) development of easy-to-use access and delivery mechanisms that promote the public's understanding of health information, drawing on research in lay terminology, graphical and multimedia presentations; (2) assisting those providing health information to the public to make effective use of electronic services through Internet connections, training, and other means, with an emphasis on those serving low income populations and seniors; (3) promoting integrations of NLM services with other electronic services covering regional, state, or local health information; and (4) conducting and supporting research, development, and evaluation of the public's health information needs, information seeking behavior and learning styles, information systems that meet the public's needs, and the impact of access to information.

NLM has become an international leader in health informatics research and development, especially in consumer health informatics. As a result, NLM needs to remain contemporary in consumer health informatics research by utilizing research methods that yield a better understanding of the predictors of consumer satisfaction. Without ongoing insights into the predictors of consumer satisfaction, NLM will lack the research findings to make evidence-based changes in the content, design and editorial management of its consumer Web sites and will not optimally serve the public.

On January 21, 2009, the President issued a memorandum calling for the establishment of “a system of transparency, public participation, and collaboration.” The memorandum required an Open Government Directive to be issued by the Director of the Office of Management and Budget (OMB). Following the President’s memorandum, OMB’s Open Government Directive required a series of measures to promote the commitments to transparency, participation, and collaboration to include the availability and uses of “generic” Information Collection Requests (ICRs).

In later guidance issued under the Open Government Directive, it was made clear that clearances of generic ICRs do provide a significantly streamlined process by which agencies may obtain OMB’s approval for particular information collections including customer satisfaction surveys, focus groups, contests, and website satisfaction surveys.

One of the most effective means of determining if NLM is providing satisfactory services to its customers or partners is through periodic voluntary satisfaction surveys that can be activated quickly. Getting customer/partner input has and will continue to facilitate resource allocation.

A.2 Purpose and Use of the Information Collection

This is a request for a reinstatement without change of NLM’s current generic clearance authorization. NLM will continue to collect and use information gathered through these surveys to identify strengths and weaknesses in current service provisions and to make improvements that are practical and feasible. Information from the customer and/or partner surveys will be used to plan and direct resources and efforts to improve or maintain NLM’s high quality of service to affected public. To assess the needs of rurally situated health care providers, NLM needs to conduct periodic surveys to ensure that these providers have the ability to access the wealth of information in the Library’s many databases and programs. If this information is not collected, vital feedback, regarding customer and/or partner satisfaction with various aspects of NLM’s services will be unavailable. As part of NLM’s mission to provide ongoing outreach programs in collaboration with our customers and partners, distance education learning has been developed for school students interested in careers in healthcare professions.

Without ongoing insights into the predictors of consumer satisfaction, NLM will lack the research findings to make evidence-based changes in the content, design and editorial management of its consumer Web sites and cannot optimally serve the public. Some of the predictors of consumer satisfaction identified include content quality, usability and design; consumer health information seeking habits on the Internet; prior online

experience and health knowledge; as well as demographic information. The ongoing assessments of broad consumer attitudes about health, wellness and motivational inclinations remain highly important in predicting consumer satisfaction of consumer informatics websites as more traditional demographic variables such as gender, education level, age and geographic location. To better assess the effectiveness and customer/partner satisfaction in administering our distance education outreach engagements, NLM will collect baseline career information from students during the course of their education mentoring programs. These measures or survey instruments will typically be student career essays, a health career knowledge-interest inventory, and general career inventories.

To explore consumer attitudes as predictors of consumer satisfaction, NLM may employ some social science methods that are widely advocated within the health communication, mass communication and consumer health informatics research literature. These methods may include occasionally asking respondents to sort through opinion statements with which they agree or disagree and then, specify what opinion statements they agree or disagree with the most. NLM will use a second level discrimination in surveys where the selected sample is derived from experienced computer users. The discrimination approach to measure attitudes is most simplified by web-based software, therefore NLM will use this approach for online or computer work station-based consumer satisfaction surveys. The use of this approach provides better insights into the attitudes that predict consumer satisfaction of health information Web sites, which keeps NLM at the forefront of consumer health informatics research and development.

One example of how NLM staff used feedback from customers and partners to improve services was information collected to better understand the roles librarians currently play in disaster planning, response, and recovery. This information collection was used to inform the assessment and update of NLM's current resources, as well as the creation of new resources to best meet the needs of librarians that are planning for, amid, or recovering from a disaster or emergency. As the roles for librarians in disaster planning, response, and recovery evolve, these resources must as well.

An example of this approved generic survey conducted under the current clearance is provided (Attachment 1) along with the sample survey instrument (Attachment 2). A mini-supporting statement submission template is provided (Attachment 3). A listing of the previously approved Information Collection Requests (ICR) authorized by OMB for NLM to conduct under this clearance is provided (Attachment 4).

According to OMB guidelines for generic clearances for voluntary customer/partner satisfaction surveys, the NLM will establish an independent review process to assure the development and implementation of high-quality customer/partner surveys within the NLM. It is understood that if OMB approves this request for extension of generic clearance, individual survey instruments must be submitted to OMB prior to actual use.

A.3 Use of Improved Information Technology and Burden Reduction

As appropriate, automated information technology will be used to collect and process information for these surveys to reduce the burden on the public. For example, the use of secondary discrimination techniques to better assess consumer attitudes is dependent on the use of information technology to reduce the burden on the respondent and as aforementioned, often shortens the length of survey instruments. The majority of the surveys will be web-based or using focus groups involving written or oral responses to brief questionnaires.\

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

NLM information collection surveys conducted after the approval of previous generic clearance under OMB 0925-0476 were designed to address specific programs and databases and to obtain feedback for desired improvements to present systems and programs. There is a need for continual input from customers and partners and as NLM has incorporated suggestions from earlier surveys into procedures, it is necessary to ask if the improvements are efficacious. The reinstatement of this generic clearance will enable NLM to determine if there have been improvements in service that resulted from the previous feedback customers provided.

A.5 Impact on Small Businesses or Other Small Entities

Small businesses or other small entities may be involved in these efforts, but NLM will keep the burden on them to a minimum with short, user-friendly surveys that will be strictly voluntary. Therefore, there will not be a significant impact on small businesses.

A.6 Consequences of Collecting the Information Less Frequently

NLM will conduct surveys only at intervals considered appropriate to measure the impact of changes because of initial satisfaction surveys and to monitor the level of performance. In most cases, the NLM likely will conduct satisfaction surveys annually or biennially after the establishment of a baseline. Collection on a less frequent basis than annually or biennially might reduce the practical utility of the information and inhibit the NLM's ability to monitor changes.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

These surveys will be implemented in a manner that fully complies with 5 CFR 1320.5.

A.8.1 Comments in Response to the Federal Register Notice

A 60-day notice for public comment was published in the Federal Register on July 20, 2018 (Vol. 83 No. 140, pages 34599-34600). One public comment was received concerning the intended purposes for the proposed information collection which did not impact the estimated cost, or the burden hours being projected for this reinstatement.

A.8.2 Efforts to Consult Outside Agency

NLM programs will use routine contacts with customers and partners and other qualitative information collection activities to identify areas of interest and concern to customers. NLM will utilize in-house staff with expertise in statistics and the staff of contractors in developing survey plans. As needed, NLM may also utilize the statistical resources of the National Center for Health Statistics, which has a questionnaire design laboratory. 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

There may be a need for nominal remuneration to survey participants (e.g., focus groups).

The level of remuneration will depend on the amount of respondent time and projected expenses for each survey participant.

A.10 Assurance of Confidentiality Provided to Respondents

Individual respondents will not be identified and participation will be strictly voluntary. Respondents will be assured that neither their participation/non-participation nor any responses to items will have any effect on their eligibility for or receipt of services.

A.11 Justification for Sensitive Questions

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

A.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

The total estimated burden hours imposed by the proposed collections is provided in Table A. 12-1 below. NLM projects up to fifteen (15) customer surveys will be conducted over the duration of the 3-year clearance period with approximately 2,500 respondents and an estimated total burden of 750 hours.

Table A.12-1 Estimates of Annual Burden Hours					
Type of Collection	Type of Respondents	Number of Respondents	Annual Frequency per Response	Average Time per Response (Minutes/ Hour)	Total Burden Hours
Customer Satisfaction Surveys	General Public	1000	1	20/60	333
Focus Groups	Health Professionals	500	1	15/60	125
Usability and Pilot Testing	Librarians	500	1	20/60	167
Interviews or	Health	500	1	15/60	125

Small Discussion Groups	Educators				
TOTAL		2500	2500		750

A.12-2 Annual Cost to Respondent

Table A.12-2 presents the approximate cost to respondents over the three-year span of this generic clearance. These estimates are based on data from the Bureau of Labor Statistics. The total estimated cost to respondents is \$217,635 over a 3-year period.

Type of Respondents	Total Burden Hours	Hourly Respondent Wage Rate *	Annual Cost	Three Year Cost
General Public	333	\$24.34	\$24,340	\$73,020
Health Professionals	125	\$38.83	\$19,415	\$58,245
Librarians	167	\$29.21	\$14,605	\$43,815
Health Educators	125	\$28.37	\$14,185	\$42,555
TOTAL	750		\$72,545	\$217,635

* Bureau of Labor Statistics: The General Public rate was obtained from the http://www.bls.gov/oes/2013/may/oes_nat.htm#00-0000

The Health Professionals wage rate was obtained from https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000 29-0000 Healthcare Practitioners and Technical Occupations

The Librarian wage rate was obtained from https://www.bls.gov/oes/2017/may/oes_nat.htm#00-0000 25-4021 Librarians

Health Educators wage rate was obtained from <https://www.bls.gov/oes/2017/May/oes211091.htm> 21-1091 Health Educators

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

There is no other annual cost burden to report for respondents or record keepers for this collection.

There are no capital and startup costs/operation and maintenance costs associated with these surveys.

A.14 Annualized Cost to the Federal Government

The estimated annualized cost to the federal government is approximately **\$54,858** which amounts to a total estimated cost of **\$164,574** over the duration of three years. Table A.14-1 contains estimated costs by category of cost.

Cost Descriptions	Grade/Step	Salary	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
Supervisory Librarian	GS 14/10	\$148,967	10%		\$14,897
Technical Information Specialist	GS 14/5	\$129,869	30%		\$38,961
Contractor Cost					N/A
Travel					\$1,000
Other Cost					
					N/A
Total					\$54,858

*the Salary in table above is cited from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/DCB.aspx>

A.15 Explanation for Program Changes or Adjustments

This is a request for a reinstatement without change of NLM’s generic clearance authorization (OMB Control #:0925-0476 Expiration Date: 09/30/2018). The decrease in the estimated burdens hours is largely due to the use of the NIH-wide generic clearance (0925-0648) currently available for Customer Satisfaction and Customer Feedback. However, the need to maintain this umbrella generic clearance to conduct future information collections that are more substantive in nature is based on having sub-studies ICRs which would not be permissible under the NIH-wide generic “fast-track’ clearance.

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

NLM tabulates results immediately after completion of future surveys and strives to publish selected findings in pertinent refereed journals and other edited publications within a timely fashion in order to contribute to the literature in consumer health informatics.

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

We are not requesting an exemption to the display of the OMB Expiration date.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

This collection of information involves no exceptions to the Certification for Paperwork Reduction Act Submissions.