

SUPPORTING STATEMENT
U.S. Department of Commerce
National Institute of Standards and Technology
Generic Clearance for Usability Data Collections
OMB CONTROL NO. 0693-0043

A. JUSTIFICATION

This is a request to extend the Office of Management and Budget (OMB) approval.

1. Explain the circumstances that make the collection of information necessary.

In accordance with the Office of Management and Budget’s (OMB) regulations at 5 CFR 1320 implementing the Paperwork Reduction Act (PRA), the Government Performance and Results Modernization Act of 2012, and its mission ...

“To promote U.S. innovation and industrial competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve our quality of life.”

the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce (DOC), proposes to conduct a variety of usability data collections under this generic collection.

The data collections will be designed to determine requirements and evaluate the usability and utility of NIST research for measurement and standardization work. These data collections efforts may include, but may not be limited to electronic methodologies, empirical studies, video and audio collections, interviews, and questionnaires.

Examples of previously approved data collections include multiple collections of information from the public safety-first responders community in an effort to evaluate and determine the usability of various communication products available for use. Other examples of previous collections include the cryptography software surveys, password generation studies, and measuring the accuracy of facial forensics comparisons.

NIST will limit its inquiries to data collections that solicit strictly voluntary opinions and information and will not – under this PRA clearance request – collect information that is required (mandatory) or regulated.

For each proposed request using the generic clearance, NIST will submit the actual instrument and any related documents (letters, emails to respondents, scripts, etc.) to OMB along with responses to the following questions:

1. **Explain who will be surveyed and why the group is appropriate to survey.**
2. **Explain how the survey was developed including consultation with interested parties, pre-testing, and responses to suggestions for improvement.**
3. **Explain how the survey will be conducted, how customers will be sampled if fewer than all customers will be surveyed, expected response rate, and actions your agency plans to take to improve the response rate.**
4. **Describe how the results of the survey will be analyzed and used to generalize the results to the entire customer population.**

The following collections have been previously approved, are ongoing, and are part of this request.

Public Safety Imaging Systems – Human Perception Testing
ITL- User Perceptions of Online Privacy and Security- Phase II
Visual Perception of Color Quality Light Sources
NIST, Information Technology Laboratory (ITL), Youth Password Survey
NIST, Information Technology Laboratory (ITL), Parent Password Survey
ITL – Public Safety Communications First Responder Survey

2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

Data collected by NIST researchers will be used to help plan the direction of future research. The information collected will not be directly disseminated to the public, but aspects or portions of the information collected may be used to support research published in various journals and conferences. There will be no attribution to individuals in the analyzed data. Since the data collected from this collection may involve Human Subjects, these individual collection efforts will need to be vetted through and approved by the NIST Institutional Review Board (IRB) as needed or required.

This information collection and dissemination will comply with the NIST Chief Information Officer (CIO) Information Quality Guidelines and Standards. Quality will be ensured and established at levels appropriate to the nature and timeliness of the information to be disseminated and will include all pre-dissemination reviews, as required by the Information Quality Guidelines and Standards.

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

Whenever possible, improved information technology will be used to reduce burden on NIST's customers. In addition to traditional data collection methods, NIST will, whenever possible, offer electronic response options via the NIST Internet website and by fax.

The planned use of transactional and electronic web site surveys will substantially contribute to the number of projected responses and associated burden hours.

4. Describe efforts to identify duplication.

NIST has an internal review process that will examine each survey or data collection effort to be conducted under this generic clearance – to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. NIST is confident that the procedures in place ensure that there will be no duplication. Due the nature of NIST's unique mission and programs no similar data exists.

Individuals participating in these types of usability data collection efforts may be asked to sign an informed consent document (meaning participants are informed of the data collection and are providing their consent to participate) and no individual will be surveyed more than once for the same research study.

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

Some small businesses and other small entities may be involved in these efforts, but NIST will keep the burden to them-as well as on any business, organization, or individual-at a minimum by asking for opinions on a strictly voluntary basis and by asking for only the minimum amount of information needed to evaluate usability and utility of NIST research for measurement and standardization work.

6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.

If these surveys and other data collections were conducted less frequently or not conducted, NIST researchers would not have important information that may hinder the future direction and scope of NIST research as well as achieving NIST's mission.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.

The data collections conducted under this generic clearance will be conducted in accordance with the guidelines stated in 5 CFR 1320.05.

8. Provide citation information for the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A 60-day Federal Register Notice soliciting public comment was published on Wednesday, June 13, 2018 (Vol. 83, pg. 27543). No comments were received.

A 30-day Federal Register Notice soliciting public comment was published on Thursday, December 6, 2018 (Vol. 83, pg. 62842).

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

NIST will not provide any payment or gift to respondents to any written, telephone, comment card, or other such information collection. However, if respondents must leave their home or place of business to travel to a specific location, NIST will, on a case-by-case basis, consider a modest remuneration for the participant's travel expenses. In such cases, the remuneration may range from \$25-\$75 per individual, dependent on the data collection and the level and length of participation required of the participants.

Respondents that participate in information collections conducted in a "laboratory" type-setting (such as in-depth interviews, and usability testing, etc.) under this clearance may receive a small stipend to offset the cost of travel expenses. This practice has proven effective when recruiting subjects to participate in specific research and is employed by other Federal cognitive laboratories. The average incentive for participation in a one-on-one interview or usability is approximately \$40.

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

Individuals will be assured of confidentiality to the extent permitted by law, including the Freedom of Information Act (FOIA).

The Privacy Act (5 U.S.C. § 552a (3)) only requires a Privacy Act Statement when collecting personal information that will be placed or stored in a system of records. Each information collection under this generic clearance will be assessed for Personally Identifiable Information (PII) and how the information is stored and retrieved. If a collection is deemed to be part of a System of Records as defined by the Privacy Act, NIST will describe the appropriate System of Records Notice (SORN) and provide a Privacy Act Statement on the instrument.

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.

Not applicable, no sensitive data will be collected.

12. Provide an estimate in hours of the burden of the collection of information.

The estimated total for the three-year period of approval is 150,000 responses and 100,000 hours.

13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in Question 12 above).

Not applicable.

14. Provide estimates of annualized cost to the Federal government.

This is an umbrella submission. This Generic Clearance will involve 5 NIST employees that will devote a portion of their time, aside from normal duties, to plan, coordinate, administer, or monitor the overall types of individual information collections to be conducted. NIST estimates that it would involve an annual estimated total of 560 hours and an estimated cost of \$125,000 per year.

NIST will describe individual cost estimates for each individual information collection request made. For example, if NIST determines that a Contractor will be involved in the collection efforts, those specific costs will be described.

15. Explain the reasons for any program changes or adjustments.

The Management and Organization (M&O) Office is responsible for overseeing the Paperwork Reduction Act (PRA) Program for NIST. M&O has been conducting extensive outreach and training to our NIST customers regarding PRA and Office of Management & Budget (OMB) requirements as well as the approval process. M&O's broad outreach efforts include discussions with NIST staff at all levels of the Agency in the use of information collections for their specific needs and guidance on how to proceed.

This generic clearance for Usability Data Collections is the most highly utilized of all of NIST's generic clearances, as a result of this outreach.

The Information Technology Laboratory (ITL), the primary NIST Laboratory, that utilizes this generic clearance, anticipate that they will be tasked with multiple future studies that will include public safety-first responders across the nation.

Based on these factors, NIST will be seeking a substantial increase to our currently approved number of respondents and burden hours, to cover current and future information collections to be conducted under this request for a three (3) year renewal.

NIST is seeking approval for an estimated number of 150,000 Respondents, which includes an increase of 126,500 respondents and 100,000 burden hours, which includes an increase of 89,000 burden hours to meet our NIST customers' needs and requirements. This increase in burdens will ensure that NIST remains compliant with the PRA.

The NIST Information Technology Laboratory (ITL) is the primary user of this Generic Clearance for their usability studies, however this collection can be utilized by anyone at NIST.

In September 2018, ITL was tasked with conducting a nation-wide information collection involving Public Safety and First Responders. The estimated number of possible responses was 16,500, which exhausted our current burden inventory. NIST completed and received approval for a Nonsubstantive Change request to increase our estimated burdens to cover ITL's first responder collection.

However, after talking with the lead investigators in ITL, it was determined that they will need to complete additional "nation-wide" information collections during the next 3 years. For example, if ITL were to conduct 3 "nation-wide" collections using the same estimates (16,500 responses), NIST would use 66,000 estimated responses.

Based on that information and a review of the previous collection approved, we can up with the 100,000 estimates for responses. Our concern is ensuring that our estimates can cover NIST collections without having to request additional Nonsubstantive changes out of the normal renewal cycle. While the estimates may seem high, we thought it prudent to request an increase to our burdens to ensure that NIST has adequate burdens to cover any information collections appropriate for submission and approval under the NIST Generic Usability Clearance.

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

The results of the data collections may be used in papers published in research journals and presented at conferences. There will be no attribution to individuals in the analyzed data.

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

All written and electronic material will display the expiration date of the OMB approval of the information collection. All written and electronic surveys (with the exception of transactional surveys in the form of business reply cards where space will not permit) will also display the following notification:

This collection of information contains Paperwork Reduction Act (PRA) requirements approved by the Office of Management and Budget (OMB). Notwithstanding any other provisions of the law, no person is required to respond to, nor shall any person be subject

to a penalty for failure to comply with, a collection of information subject to the requirements of the PRA unless that collection of information displays a currently valid OMB control number. Public reporting burden for this collection is estimated to be XXXXXXXX minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Persons wishing to comment on the burden estimate or any aspect of this collection of information, or offer suggestions for reducing this burden, to the National Institute of Standards and Technology, Attn: XXAdd-Individual-Point-of-Contact_InformationXX.

OMB Control No. 0693-0043

Expiration Date: 12-31-2018

18. Explain each exception to the certification statement.

Not applicable.