

SUPPORTING STATEMENT FOR NEW AND REVISED INFORMATION COLLECTIONS

OMB CONTROL NUMBER 3038-0107

Generic Clearance for the Collection of Qualitative Feedback for Agency Service Delivery

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Order 12862 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 Commodity Futures Trading Commission's Office of Customer Education and Outreach (OCEO) seeks to obtain OMB approval of a generic clearance to collect qualitative and quantitative feedback. By feedback we mean information that provides useful insights on perceptions and opinions, but are not statistically significant surveys with results that can be generalized to the population of study.

This collection of information is necessary to enable the OCEO to garner customer and stakeholder feedback in an efficient and timely manner in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with OCEO programs. This feedback will offer insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, or 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 OCEO and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection

The OCEO will undertake a variety of service delivery-focused activities over the next few years that include customer outreach and information-sharing with stakeholders which are responsive to customers' needs and sensitive to changes in the market. The proposed information collection activity will use similar methods for information collection or otherwise share common elements, and provide a means to gather customer and stakeholder feedback in an efficient, timely manner. The solicitation of information on delivery of customer services will address such areas as appropriate messages, effective message delivery methods, effective programming, programming needs, and customer beliefs, psychographics and social norms that will assist the agency in developing outreach and communications plans.

3. Consideration Given to Information Technology

Where appropriate, automated information technology will be used to collect and process information for these surveys to reduce the burden on the public.

4. Duplication of Information

No similar data are gathered or maintained by the OCEO or are available from other sources known to the OCEO.

5. Reducing the Burden on Small Entities

Small businesses or other small entities may be involved in these efforts but the OCEO will minimize the burden on them by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments. Therefore, these surveys will not have a significant impact on small business or other small entities.

6. Consequences of Not Conducting Collection

Without this feedback, the OCEO 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

Opportunity for public comment is provided when collections are initiated or renewed. Notice of intent to renew this collection was published in the *Federal Register* on July 24, 2019 (84 FR 35606).¹ No relevant comments have been received in response to the renewal notice.

9. Payment or Gift

The screening criteria to recruit our customers for focus groups could call for respondents who meet specific criteria. In one instance, eighteen professional focus group facilities were contacted and the lowest incentive rate suggested to recruit this audience was \$75 per recruit. In addition to their time, this incentive often covers travel and childcare costs because facilities commonly recruit from a 45-mile radius and groups will not be conducted during school hours.

There are several factors that determine the amount offered to participants. As background, amounts are driven by a facility's ability to guarantee show rates. These show rates, or the rates at which respondents will "show" for research events, are tracked over time. Once show rates fall beneath the accepted industry average, facilities are forced to increase the incentive amount.

¹ <https://www.govinfo.gov/content/pkg/FR-2019-07-24/pdf/2019-15688.pdf>

10. Confidentiality

The confidentiality of respondent identification and information will be assured to the maximum extent allowed by law. Participation will be fully voluntary and, to the extent possible, responses will be anonymous.

11. Sensitive Nature

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

12. Burden of Information collection

The total annual estimated burden imposed by this collection of information is 28,800 hours annually. The burden is as follows:

Estimated number of respondents: 1,440

Estimated average number of responses: 10 per year

Estimated total average annual burden on respondents: 14,400

Frequency of collection: once per request

Average time per response: 2 hours

Estimated total annual burden hours requested: 28,800 hours

13. Costs to Respondents

No costs are anticipated.

14. Costs to the Federal Government

An outside vendor may be used to conduct the surveys, and in-house government staff retained for the management and reporting of the surveys. Minimum estimate for conducting 10 electronic surveys would be \$376,582,² which includes the development of the survey and a post-survey report multiplied by 10.

This estimate is based on an independent government cost estimate of an electronic survey fielded in 2018. The estimate considered agreed upon labor rates from the CFTC

Blanket Purchase Agreement 9523ZY-16-A-CON0240 for integrated marketing support services for the following labor categories:

² This amount is a minimum estimate because it does not include incentive recruitment cost per respondent (see item #9). Survey cost estimates will vary on a case by case basis depending on the needs and conditions required for optimal survey results. These would include in-person versus electronic surveys, geographic location, number of locations, venue charges, travel costs, number of vendors needed on location, etc.

- Senior vice president — \$225.51
- Vice president — \$204.08
- Account manager — \$153.35
- Account executive — \$99.18
- Assistant account executive — \$93.37

An average hourly rate for contract staff involved was estimated for survey development and execution. This work would involve a combination of 10 hours for the account manager and vice president at \$200 per hour or \$2,000, as well as a research team of at least two account executives (\$100 per hour each for 80 hours or \$16,000), for a total of \$18,000. An additional 10 hours for the account manager/vice president and 80 hours for two account executives were also estimated for the development of the survey report. The total estimate for one survey and report was \$36,000. For 10 reports, the total cost is assumed to be roughly 10 times this amount or \$360,000.

In addition, government staff time would be required to manage the contract as well as review and accept work product. We estimate this cost to be approximately \$16,582, based on a CFTC employee's hourly wage of \$69.09³ and management/review time to be approximately 24 hours per survey/report, multiplied by 10 (\$69.09 x 24 hrs. x 10).

15. Reason for Change in Burdens from Previous Renewal

This is a renewal request for a previous generic approval. No changes in requirements are anticipated.

16. Tabulation of Results, Schedule, Analysis Plans

Feedback collected under this generic clearance provides useful information, but does not yield data that can be generalized to the overall population.

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.

³ The hourly wage is derived from an annual salary of \$143,707 for a CT-14 employee living in the Washington DC, who has an annual base salary of \$111,125 plus \$32,582 (or 29.32%) for locality increase, according to the CFTC 2019 Pay Table. The annual salary is then converted to the hourly wage, <https://www.calcxml.com/calculators/convert-salary-to-hourly?skn=#results>