

Federal Trade Commission
Supporting Statement for Paperwork Reduction Act Generic Information Collection
Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery
(OMB Control No. 3084-0159)

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. To ensure that agency programs are effective and meet customer needs, the Federal Trade Commission (“FTC”) is requesting OMB approval for an additional three (3) years for its generic information plan to obtain qualitative feedback on agency programs. “Qualitative feedback” denotes information that provides useful insights on perceptions and opinions, but does not include statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the FTC to garner customer and stakeholder feedback in an efficient, 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 the FTC’s programs. This feedback will provide 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 FTC 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 FTC will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. 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. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers and stakeholders on the FTC’s services will be unavailable.

The FTC will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used only internally for general service improvement and program management purposes and is not intended for release outside of the agency (if released, procedures outlined in Question 16 will be followed);

- Information gathered will not be used for the purpose of substantially informing influential policy decisions;¹
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the population of study;
- The collections are voluntary;
- The collections are 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 collections are non-controversial and do 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; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.
- If these conditions are not met, the FTC 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.

If these conditions are not met, the FTC will submit an information collection request to OMB for approval through the normal PRA process.

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

¹ As defined in OMB and agency Information Quality Guidelines, “influential” means that “an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions.”

The FTC 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 FTC 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 FTC or are available from other sources known to the FTC.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but the FTC 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. Additionally, all collections will be voluntary and low burden.

6. Consequences of Not Conducting Collection

Without these types of feedback, the FTC 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), the FTC published a notice in the *Federal Register* allowing the public 60 days to comment on the proposed extension of this information collection. *See* 84 FR 70972 (Dec. 26, 2019). One relevant comment was received from an interested person. The commenter stated that he believed the collection and analysis of these qualitative statistics will be useful in improving the delivery of the many services of the FTC.

9. Payment or Gift

The FTC will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions. In the case of in-person cognitive laboratory and usability studies, the FTC may provide stipends of up to \$40. In the case of in-person focus groups, the FTC 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 FTC plans to offer non-standard stipends, it 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 FTC will only include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by 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 FTC 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 (1,759) are based on the number of collections we expect to conduct over the requested period for this clearance. This yields an estimated three-year burden of 5,277 hours.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours Per Response	Total Hours
Customer Satisfaction Surveys	5,500	1	.25	1,375
Focus Groups	120	1	2.0	240
Usability Testing	144	1	1.0	144
Total Annual Burden	5,764			1,759
Total Three-Year Burden	17,292			5,277

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$399,250 annually. These costs are comprised of costs for contractor payments and participant stipends (\$379,250), computer software (\$15,000), and printing (\$5,000).

15. Reasons for Any Change or Adjustments on Burden Worksheet

The FTC's existing clearance for 3084-0159 expires on May 31, 2020. As described in Section 12 above, the FTC requests approval for a total of 5,277 burden hours over the course of the three-year renewal period.

Summary of Burden Changes			
	Responses	Burden Hours	Cost Burden
Total 3-Year Burden Requested	17,292	5,277	0
Current OMB Inventory	8,040	3,465	0
Difference (+/-)	(+ 9,252)	(+ 1,812)	0

The change in burden hours requested results from an increase in the anticipated number of collections expected over the requested three-year period for this clearance. FTC staff anticipates increased utilization of the generic clearance to obtain qualitative feedback on agency service delivery over the course of the renewal period.

16. Plans for Tabulation, Statistical Analysis, and Publication

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. The information gathered is intended to be used only internally for general service improvement and program management and is not intended for publication or other public release.

Although the FTC does not intend to publish its findings, it may receive requests to release the information (e.g., congressional inquiries, Freedom of Information Act requests). The FTC will disseminate the findings when appropriate, strictly following the FTC's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Federal Trade Commission," and will include specific discussion of the limitation of the qualitative results discussed above.

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

The FTC certifies that this collection of information is consistent with the requirements in 5 CFR § 1320.9, and is not seeking an exception to those certification requirements.