Supporting Statement A for

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NCI)

OMB#:0925-0642 Expiration Date: 5/31/2020

This is an extension to the original submission and all changes are highlighted in yellow

Date: February 4, 2020

Check off which applies:

- New
- Revision
- Reinstatement with Change
- Reinstatement without Change

X Extension

- Emergency
- Existing Collection in Use Without an OMB Number

Federal Government Employee Address:

Name: Diane Kreinbrink

Address: 9609 Medical Center Drive

Telephone: (240) 276-7283

Email: diane.kreinbrink@nih.gov

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Attachments

1. Sub-Study Template Submission Form
2. List of Sub-Study Approvals
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A. Justification

Department of Health and Human Services (DHHS), National Institutes of Health (NIH), National Cancer Institute (NCI), seeks to obtain OMB approval to **extend** the generic clearance to collect qualitative feedback on our service delivery for an additional three (3) years.

This information collection activity has garnered qualitative customer and stakeholder feedback in an efficient, timely manner, in accordance with the Administration's commitment to improving service delivery. This generic has provided information about the National Cancer Institute's 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. It has also allowed feedback to contribute directly to the improvement of program management. Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population.

A.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, Department of Health and Human Services (DHHS), National Institutes of Health (NIH), National Cancer Center (NCI), (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 are not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the agency 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 helps to ensure that users have an effective, efficient, and satisfying experience with the agency's programs. This feedback provides 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 allow for ongoing, collaborative and actionable communications between the agency and its customers and stakeholders. It also allows feedback to contribute directly to the improvement of program management.

A.2 Purpose and Use of the Information Collection

Improving agency programs requires ongoing assessment of service delivery, by which we mean systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The agency has collected, analyzed, and interpreted 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 targets areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses are assessed to plan and inform efforts to improve or maintain the quality of service offered to the public (see Attachment 1). If this information is not collected, vital feedback from customers and stakeholders on the agency's services will be unavailable.

The agency only submits 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 DHHS (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 another Federal agency;
- 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 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; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

Since the previous submission, there have been 60 approved sub-studies under this generic clearance with 7,579 burden hours over 2.5 years, all contributing significantly to the mission of NCI. These projects have

[1] As defined in OMB and DHHS, "Guidelines for Ensuring the Quality of Information Disseminated to the Public," "influential" means that 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."

ranged from website usability testing to meeting and customer satisfaction surveys. Attachment 2 provides a list of the information collections (sub-studies) that have been previously approved.

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.

The planned proposed changes are: 1) due to cost of living increases within the Bureau of Labor Statistics wage rates, and 2) a request for additional burden hours and number of respondents to accommodate the anticipated requests over the next three years that will warrant the collection of information within the scope of this generic. Purpose, use, methodology, and design remain the same as the previously approved submission.

A.3 Use of Information Technology and Burden Reduction

If appropriate, agency will collect information electronically and/or use online collaboration tools to reduce burden.

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

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

A.5 Impact on Small Businesses or Other Small Entities

Small business or other small entities may be involved in these efforts, but the agency minimizes 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.

A.6 Consequences of Collecting the Information Less Frequently

This is a one-time information collection.

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

There are no special circumstances. The information collected is voluntary and is not used for statistical purposes.

A.8.1 Comments in Response to the Federal Register Notice

The 60-day Federal Register Notice was published on December 3, 2019, Vol. 84, No. 232, Page 66209 and allowed 60 days for public comment. One public comment was received.

A.8.2 Efforts to Consult Outside Agency

No consultation has taken place.

A.9 Explanation of Any Payment of Gift to Respondents

The agency does 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 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.

A.10 Assurance of Confidentiality Provided to Respondents

All information will be kept private to the extent allowable under law.

A.11 Justification for Sensitive Questions

No questions are asked that are of a personal or sensitive nature.

A.12.1 Estimated Annualized Burden Hours

The total annual burden hours requested is 9,337 based on the number of collections we expect to conduct. A variety of instruments and platforms will be used to collect information from respondents. This request in burden hours has slightly increased from the previously approved submission. The number of respondents has also increased.

A.12-1 Estimated Annualized Burden Hours

Form Name	Type of Respondents	Number of Respondents	Number of Responses per Respondent	Average Burden Per Response (in hours)	Total Annual Burden Hours
Surveys	Individuals	27,100	1	12/60	5,420
In-Depth Interviews (IDIs) or Small Discussion Groups	Individuals	500	1	90/60	750
Focus Groups	Individuals	1000	1	90/60	1,500
Website or Software Usability Tests	Individuals	5000	1	20/60	1,667
Total			**33,600**		**9,337**

A.12-2 Annualized Cost to Respondents

The annualized cost to the respondents is $233,238.26

Table 12-2 Annualized Cost to the Respondents

Form Name	Type of Respondents	Total Annual Burden Hours	Hourly Respondent Wage Rate*	Respondent Cost
Surveys	Individuals	5,420	$24.98	$135,391.60
In-Depth Interviews (IDIs) or Small Discussion Groups	Individuals	750	$24.98	$18,735.00
Focus Groups	Individuals	1,500	$24.98	$37,470.00
Website or Software Usability Tests	Individuals	1,667	$24.98	$41,641.66
Total		**9,337**		**$233,238.26**

The wage rate, $24.98, was calculated using the Bureau of Labor statistics occupation title "All Occupations", occupation code "00-0000", http://www.bls.gov/oes/current/oes_nat.htm#00-0000.

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

There are no other costs.

A.14 Annualized Cost to the Federal Government

The annualized cost to the Federal Government for the proposed data collection effort is $20,532.60.

Cost Descriptions	Grade/Step	Salary**	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
Management Analyst	13/1	$102,663	20%		$ 20,532.60
Contractor Cost					$0
Travel					$0
Other Cost					$0
Total					**$20,532.60**

**The Salary in the table above is cited from: Office of Personnel Management https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf.

A.15 Explanation for Program Changes or Adjustments

This is an Extension of a currently approved submission. There are no substantive changes to this submission, however the burden hours have increased by 420 hours.

NCI, through various outreach meetings and discussions have increased the visibility of the PRA program. This outreach has led to an increase in requests and is projected to continue as more departments, offices, and centers become aware of the process .

This is the difference of the previously approved 8,917 minus the proposed, 9,337. The total number of respondents has increased by 17,100 from 10,000 to 27,100. This increase is to account for the increased survey activities that are planned.

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

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, Freedom of Information Act requests). The agency will disseminate the findings when appropriate, strictly following the DHHS'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.

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

No exemption is being proposed.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.