

**Department of Transportation
Pipeline and Hazardous Materials Safety Administration (PHMSA)**

**SUPPORTING STATEMENT
Generic Clearance for Collection of Qualitative
Feedback on Agency Service Delivery
OMB No. 2137-XXXX**

INTRODUCTION:

This is to request the Office of Management and Budget's (OMB) approval for Collection of Qualitative Feedback on Agency Service Delivery. This Information Collection Request (ICR) will allow the Pipeline and Hazardous Materials Safety Administration (PHMSA) to obtain qualitative feedback from customers and stakeholders on its service delivery. This is a new request from PHMSA to obtain OMB approval for a customer satisfaction survey.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Order 12862 directed Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In order to continuously work to ensure that our programs are effective and meet our customers' needs, PHMSA seeks to obtain an OMB approval of a Fast Track 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 PHMSA 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 Agency'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. This collection will 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.

2. Purpose and Use of the Information Collection

Improving PHMSA's 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. PHMSA

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 PHMSA's services will be unavailable.

PHMSA 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
- This collection is submitted anonymously and no personally identifiable information (PII) is collected.

If these conditions are not met, PHMSA 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:

- Customer comment forms
- Stakeholder satisfaction feedback form

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."

PHMSA will review 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, agencies 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 PHMSA or are available from other sources known to PHMSA.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but PHMSA 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.

6. Consequences of Not Conducting Collection

Without these types of feedback, PHMSA would 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), on December 22, 2010, a 60-day notice for public comment was published in the *Federal Register* (75 FR 80542), and a 30-day notice was published on [Insert 30-day Publication date] (XX FR XXXXX).

9. Payment or Gift

PHMSA will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, PHMSA 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 PHMSA 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 (312.5 hours) are based on the number of collections we expect to conduct over the requested period for this clearance. It is anticipated that PHMSA will conduct at least one collection of qualitative feedback on service delivery each year, estimated to take no more than 5 minutes per respondent. Therefore, based on the estimated number of respondents (50 each), the total hours equate to approximately 4 hours per occurrence (50 respondents x 5 minutes per response = 4.167 hours). PHMSA estimates approximately 75 annual activities, for a total of 312.5 annual burden hours (75 annual activities x 4 hours).

13. Costs to Respondents

There are no additional out of pocket cost burdens associated with this ICR.

14. Costs to Federal Government

Costs are calculated by the amount of time it will take for PHMSA to develop the feedback form, collect the customer feedback forms, and input the data into a PHMSA customer feedback database.

The anticipated annual cost to the Federal Government is estimated to be approximately \$3,842 over the three year request.

15. Reason for Change

This is a new ICR request.

16. Tabulation of Results, Schedule, Analysis Plans

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 PHMSA does not intend to publish its findings, PHMSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). PHMSA will disseminate the findings when appropriate, strictly following PHMSA'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.

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.