

SUPPORTING STATEMENT

Part A

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

OMB Number 0935-0179

Version: 4/20/2020

Agency of Healthcare Research and Quality (AHRQ)

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, AHRQ (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 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. These collections will allow for ongoing, collaborative and actionable communications between the Agency 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

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 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 Agency's services will be unavailable.

The Agency 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 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.

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 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)

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.

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 the Agency or are available from other sources known to the Agency.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but the Agency 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, the Agency 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), a 60-day notice for public comment was published in the *Federal Register* on June 11, 2020 on Page 35654, Volume 85, and allowed 60 days for public comment. No comments were received.

9. Payment or Gift

AHRQ will, on a case-by-case basis, consider modest remuneration for survey respondents and focus group participant's time and travel. In such cases, the remuneration will typically not exceed \$30 per individual. AHRQ may ask for a higher amount for hard to reach populations. Remuneration for focus group participation is a recognized standard industry practice, without which, it would be difficult to achieve appropriate and adequate participation.

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, the Agency 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 agency 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

Exhibit 1 shows the estimated total burden hours for the respondents. Mail surveys are estimated to average 15 minutes, telephone surveys 40 minutes, web-based surveys 10 minutes, focus groups two hours, and in-person interviews are estimated to average 50 minutes. Mail surveys may also be sent to respondents via email, and may include a telephone non-response follow-up. Telephone non-response follow-up for mailed surveys does not count as a telephone survey. The total burden hours for the 3 years of the clearance is estimated to be 10,900 hours.

Exhibit 2 shows the estimated cost burden for the respondents. The total cost burden for the 3 years of the clearance is estimated to be \$408,093.

Exhibit 1. Estimated burden hours over 3 years

Type of Information Collection	Number of Respondents	Number of responses per respondent	Hours per response	Total Burden hours
Mail/email*	5,000	1	15/60	1,250

Telephone	200	1	40/60	133
Web-based	5,000	1	10/60	833
Focus Groups	500	1	2.0	1,000
In-person	200	1	50/60	167
Total	10,900	na	na	3,383

* May include telephone non-response follow-up in which case the burden will not change

Exhibit 2. Estimated cost burden over 3 years

Type of Information Collection	Number of Respondents	Total Burden hours	Average Hourly Wage Rate*	Total Cost Burden
Mail/email	5,000	1,250	\$40.21	\$50,263
Telephone	200	133	\$40.21	\$5,348
Web-based	5,000	833	\$40.21	\$33,495
Focus Groups	500	1,000	\$40.21	\$40,210
In-person	200	167	\$40.21	\$6,715
Total	10,900	3,383	\$40.21	\$136,031

* Bureau of Labor & Statistics on "Occupational Employment and Wages, May 2019" found at the following URL: https://www.bls.gov/oes/current/oes_nat.htm#b29-0000.htm for the respondents. The total cost burden for the 3 years of the clearance is estimated to be \$408,093.

13. Costs to Respondents

Capital and maintenance costs include the purchase of equipment, computers or computer software or services, or storage facilities for records, as a result of complying with this data collection. There are no direct costs to respondents other than their time to participate in the study.

14. Costs to Federal Government

Information collections conducted under this generic clearance will in some cases be carried out under contract. Assuming the contract cost per survey are \$50,000 - \$100,000, which includes \$20,000 for each focus group (10 focus groups per fiscal year), total contract costs could run \$750,000 per year (10 focus groups x \$75,000 average survey cost). An additional annual cost of about \$98,556 for agency staff would be associated with this assuming 10 surveys and 10 focus groups per fiscal year with 10 GS14/5 program analysts or project officers (\$137,491 annual salary*) and 5% of their time each fiscal year. The total annual cost to the government is estimated to be \$848,556.

Annual salaries based on 2020 OPM Pay Schedule for Washington/DC area:

<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2020/DCB.pdf>

15. Reason for Change

There is no change in the total number of burden hours.

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 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 Agency'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. Exemption for Display of Expiration Date

AHRQ does not seek this exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.

List of Attachments:

Attachment A -- Healthcare Research and Quality Act of 1999

Attachment B -- Submission Form

Attachment C - 60 day Federal Register notice