

## Supporting Statement – Part A

### Fast Track Generic Clearance for Qualitative Feedback on Customer Satisfaction Surveys

From the

NATIONAL AGRICULTURAL STATISTICS SERVICE (NASS)

OMB No. 0535 – 0261

#### A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

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 ensure that our programs are effective and meet our users' needs, the National Agricultural Statistics Service (NASS) seeks to obtain OMB approval for the renewal of this generic clearance to collect qualitative feedback on our products and services. The qualitative information to be collected is intended to provide useful insights on user perceptions and opinions. It is not intended to yield quantitative results that are statistically generalizable to any larger populations.

This collection of information is necessary to enable NASS to obtain feedback in an efficient, timely manner, in accordance with our commitment to improving the quality, usability, and ease of accessing our surveys and public information. This feedback will provide insights into user perceptions, experiences, expectations, and provide an early warning of issues with service; and focus attention on areas where communication, training, or changes in operations might improve delivery of products and services. These collections will allow for ongoing, collaborative, and actionable communications between NASS and its customers and stakeholders. The feedback will also contribute directly to the improvement of program management.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

NASS will collect, analyze, summarize, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current products and services and make improvements based on the collected 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 used to plan and inform efforts to improve 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<sup>1</sup>;
- 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, NASS 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 five business days.

The types of collections that this generic clearance covers include, but are not limited to:

- Customer comment cards/complaint forms

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<sup>1</sup> 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."

- 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. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

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**

The information requested, can be provided with little or no difficulty on the individuals selected to participate in these surveys. Approximately 95 percent of the individuals or operations in the samples can be classified as small businesses (as defined in the Small Business Administration).

**6. Consequences of Not Conducting Collection**

Without these types of feedback, NASS 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**

Comments on this data collection effort were solicited in the Federal Register, Vol. 85, Number 126, pages 39,161 – 39,162 published on June 30, 2020. No comments were received.

## **9. Payment or Gift**

NASS typically will not provide payment or other forms of remuneration to respondents. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, NASS may provide stipends of up to \$40. In the case of in-person focus groups, NASS 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 NASS plans to offer non-standard stipends, NASS will provide OMB with additional justifications in the request for clearance of these specific activities.

## **10. Confidentiality**

Questionnaires include a statement that individual reports are confidential. U.S. Code Title 18, Section 1905; U.S. Code Title 7, Section 2276; and Public Law 107-347, Title V (CIPSEA) provide for confidentiality of reported information. All employees of NASS and all enumerators hired and supervised under a cooperative agreement with the National Association of State Departments of Agriculture (NASDA) must read the regulations and sign a statement of compliance.

Additionally, NASS employees and NASS contractors comply with the OMB implementation guidance document, "Implementation Guidance for Title V of the E-Government Act, Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA)." CIPSEA supports NASS's pledge of confidentiality to all respondents and facilitates the agency's efforts to reduce burden by supporting statistical activities of collaborative agencies through designation of NASS agents, subject to the limitations and penalties described in CIPSEA.

The following confidentiality pledge statement will appear on all NASS questionnaires.

The information you provide will be used for statistical purposes only. Your responses will be kept confidential and any person who willfully discloses ANY identifiable information about you or your operation is subject to a jail term, a fine, or both. This survey is conducted in accordance with the Confidential Information Protection provisions of Title V, Subtitle A, Public

Law 107-347 and other applicable Federal laws. For more information on how we protect your information, please visit: <https://www.nass.usda.gov/confidentiality>.

## **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.

This renewal has a sample size of 120,000, a total number of 120,000 responses and 8,375 burden hours. The annual burden hours requested 8,375 are based on the number of collections we expect to conduct over the requested period for this clearance.

Average minutes per response for the surveys included in this docket range from five to twenty minutes. Total hours of burden are shown in the table below.

Cost to the public of completing a questionnaire is assumed comparable to the hourly rate of those requesting the data. Reporting time of 8,375 hours is multiplied by \$37.47 per hour for a total cost to the public of \$313,811.25.

NASS uses the Bureau of Labor Statistics' [Occupational Employment Statistics](#) (most recently published on March 31, 2020 for the previous May) to estimate an hourly wage for the burden cost. The May 2019 mean wage for bookkeepers was \$20.65. The mean wage for farm managers was \$38.63. The mean wage for farm supervisors was \$25.25. The mean wage of the three is \$28.18. To calculate the fully loaded wage rate (includes allowances for Social Security, insurance, etc.) NASS will add 33% for a total of \$37.47 per hour.

Estimated Sample Size and Respondent Burden for 2021 - 2023											
Survey Name	Sample Size	Waves of Data Collection	Responses <sup>1/</sup>				Non-response				Total Burden Hours
			Resp. Count	Freq x Count	Min./ Resp	Burden Hours	Nonresp Count	Waves x Count	Min./ Nonresp	Burden Hours	
Customer Satisfaction Surveys	75,000	1	18,750	18,750	15	4,688	56,250	56,250	1	938	5,625
Customer Usability Surveys	25,000	1	6,250	6,250	5	521	18,750	18,750	1	313	833
Customer Opinion Surveys	20,000	1	5,000	5,000	20	1,667	15,000	15,000	1	250	1,917
<b>Total</b>	120,000		30,000	30,000		6,875	90,000	90,000		1,500	8,375

### **13. Costs to Respondents**

No costs are anticipated.

### **14. Costs to Federal Government**

The "State Satisfaction Surveys" will be paid for completely through cooperator agreements with NASS by the individual states. The other customer satisfaction and usability surveys are a part of the development and analysis process of existing surveys. The funding for these surveys is already included in the individual dockets as a part of our normal survey development processes.

### **15. Reason for Change**

There are no changes in the current request from the previous approval.

### **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 any larger populations. Findings will be used for general service improvement, and are not for publication or other public release. If NASS conducts a survey for a cooperator under this fast track approval, then the cooperator must agree to this stipulation.

Although NASS does not intend to publish its findings, NASS may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). NASS will disseminate the findings when appropriate, strictly following OMB's "Standards and Guidelines for Statistical Surveys", 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.

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