

## **Department of Transportation**

### **SUPPORTING STATEMENT**

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

#### **INTRODUCTION**

This is to request the Office of Management and Budget's (OMB) three-year approval clearance for the information collection entitled, "Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery" (OMB Control No. 2133-0543), which is currently due to expire on December 31, 2020. Note: The burden hours increased to reflect the proposed estimated time it could take to conduct various avenues for collecting information from the public; i.e., focus group, listening sessions, customer surveys, etc. for improving service delivery

#### **Part 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, the Maritime Administration (MARAD) (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 <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, 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

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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."

- 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 August 12, 2020 (FR 48758, Vol. 85, No. 156) indicating comments should be submitted on or before October 13, 2020. No comments were received. In addition, a 30-day notice for comments was published on \_\_\_\_\_, 2020 (FR \_\_\_\_\_, Vol. 85, No. \_\_\_\_\_ indicating comments must be submitted on or before \_\_\_\_\_, 2020.

### **9. Payment or Gift**

No payment or gift will be provided to any respondent.

### 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

It is estimated that a variety of instruments and/or platforms will be used under this clearance to collect information from respondents. The exact number and different instruments/platforms, length of each, and number of respondents and burden hours are unknown at this time. Therefore, MARAD is requesting an estimated number of 1958 burden hours and 6000 for respondents.

<b>Estimated Annual Reporting Burden</b>				
<b>Proposed Type of Collection</b>	<b>No. of Respondents</b>	<b>Annual Frequency per Response</b>	<b>Hours per Response</b>	<b>Total Hours</b>
Customer Satisfaction (Web,E-mail, Face to Face, etc.)	5000	1	10 minutes	833
Focus Group	200	1	2 hours	400
Listening Sessions/Stakeholder Feedback Forums	300	1	2 hours	600
Strategic Planning Customer Satisfactory Survey	500	1	15	125
<b>Totals</b>	<b>6000</b>			<b>1958</b>

### 13. Costs to Respondents

No costs are anticipated.

### 14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$14,097.16 annually. It is estimated that two employees and one contract support will spend a total of 100 hours annually recording, assimilating, analyzing and reporting information submitted with each survey. Therefore, given the estimated hourly salary and benefit costs for each employee, the cost to the Government is estimated as follows:

**Estimated Federal Government and Contractors Labor Costs**

Staff	Wage + Overhead	Time (h)	Total Cost
GS-14 (Step 10)	\$75.57	20	\$ 1,511.40
GS-13 (Step 10)	\$63.95	40	\$ 2,558.00
Contract Support	\$150.00	40	\$ 6,000.00
Total	--	100	\$10,069.40
Total times 1.4			\$14,097.16

**15. Reason for Change**

The burden hours increased to reflect the proposed estimated time it could take to conduct various avenues for collecting information from the public; etc. focus group, listening sessions, customer surveys, etc. for improving service delivery

**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. 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.