

**Supporting Statement for Paperwork Reduction Act Generic Information Collection  
Submissions for  
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”**

**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 United States International Development Finance Corporation, (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. 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;

- 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
- Cognitive studies, such as those used to refine questions or assess usability of a website;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; seminar surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

The Agency 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.

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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.”

#### **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**

A 60-day notice for public comment was published in the *Federal Register* on July 5, 2019 at Volume 84, page 32224. No comments were received. A 30-day Federal Register notice was published on September 12, 2019 at Volume 82, page 48185.

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

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

#### **10. Confidentiality**

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) and will process any such requests under the applicable law.

#### **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 100 are based on the number of collections we expect to conduct over the requested period for this clearance.

| Estimated Annual Reporting Burden |                    |                               |                    |             |
|-----------------------------------|--------------------|-------------------------------|--------------------|-------------|
| Type of Collection                | No. of Respondents | Annual Frequency per Response | Hours per Response | Total Hours |
| Customer satisfaction survey      | 200                | 1                             | 0.5                | 100         |

**13. Costs to Respondents**

No costs are anticipated.

**14. Costs to Federal Government**

The anticipated cost to the Federal Government is approximately \$1,000.00 annually. These costs are comprised of mainly staff time and use of equipment.

**15. Reason for Change**

Not applicable. This is a new request for a generic ICR.

**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.

**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.