

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

PART A

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 U.S. Equal Employment Opportunity Commission (hereafter “the Agency”) seeks to obtain OMB approval, under the Paperwork Reduction Act of 1995 (PRA), of a revision to the current 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, course materials, course instructor, 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:

- 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 the only way to collect information; there are no alternative existing sources
- The collections are noncontroversial 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;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
- 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; and
- 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.

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 survey). 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:

- Qualitative customer feedback surveys (e.g., post-transaction surveys; opt-out web surveys)

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

The Agency plans to collect information electronically and/or use online collaboration tools to the greatest extent possible to reduce burden. The agency anticipates most respondents will provide feedback electronically.

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), on November 18, 2020, a 60-day notice for public comment was published in the *Federal Register* (See 85 FR 73479). One comment was received from the public in response to the 60-day notice published in the *Federal Register*. The comment raised concerns regarding prospective employers requesting a transgender person's previous name(s) prior to their gender transition. Information regarding a person's previous name(s) is not requested as part of the Agency's information collections of customer and stakeholder feedback on Agency service delivery. Accordingly, no changes have been made to the Generic Clearance based upon this comment.

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

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

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (45,532) are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Survey	Number of Respondents	Number of Responses/Respondent	Participation Time	Response Burden (in hours)
Questionnaire – FEPA Training Conference Feedback	550	1	2 minutes per response	18
Questionnaire - Technical Assistance Program Feedback	4,500	1	2 minutes per response	150
Questionnaire - EXCEL Customer Feedback	250	1	10 minutes per response	42
Questionnaire – Respectful Workplace Training Feedback	15,900	2 (survey delivered twice to same respondents)	10 minutes per response	5,300
Questionnaire – Federal Course Evaluation Form	9,180	1	2 minutes per response	306
Future Training Assessments	7,200	1	5 minutes per response	600
EEOC Website Feedback Forms	1,173,472	1	2 minutes per response	39,116

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$23,743.95 annually. These costs are comprised of: staff time related to production and dissemination of the survey materials and analysis of responses, and for costs related to survey software.

15. Reason for Change

In addition to clearance hours for the previously approved customer feedback forms, the EEOC requested an additional 39,716 clearance hours. Most of these requested hours – 39,116 – are for a randomly-generated, pop-up form that will solicit feedback from a sample of visitors to the EEOC website on the contents and performance of the webpages. The 39,116 hours burden estimate is based on the number of webpage views in a year. The remaining 600 hours represent a reserve to cover any additional feedback forms that may be developed over the next three years for new trainings offered by the EEOC.

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 population of study. 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 in response to such requests when appropriate under applicable federal privacy and confidentiality laws.

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.