

GUIDELINES FOR SUBMISSION OF A REQUEST UNDER THE DOI GENERIC "FAST TRACK" CLEARANCE FOR THE COLLECTION OF QUALITATIVE FEEDBACK ON AGENCY SERVICE DELIVERY

PURPOSE

The Department of the Interior (DOI) guidelines for the DOI "Fast Track" clearance process will help offices and bureaus successfully use the expedited generic clearance process to collect qualitative feedback on agency service delivery.

WHEN CAN I USE THE NEW "FAST TRACK" PROCESS?

The Fast Track process is designed for a wide range of information collections that focus on the awareness, understanding, attitudes, preferences, or experiences of customers or other stakeholders (e.g., delivery partners, co-regulators, potential customers) relating to existing or future services, products or communication materials. The objective of data collections eligible for the Fast Track process is to improve existing or future service deliveries, products, or communication materials.

WHEN SHOULD AN AGENCY USE THE "FAST TRACK" PROCESS?

You should consider using the Fast Track process for your data collection when the data collection meets all of the following criteria:

- A. The purpose of the collection is to assist the agency in improving existing or future service deliveries, products, or communication materials;
- B. Participation by respondents is voluntary;
- C. The collection does not impose a significant burden on respondents (see the further discussion below, at VI);
- D. The collection does not require statistical rigor in order to have practical utility for improving existing or future service deliveries, products, or communication materials; and
- E. Agencies will not publically disseminate the results.

WHAT TYPES OF ACTIVITIES ARE COVERED BY THE "FAST TRACK" PROCESS?

As a general matter, the following kinds of collections fall under the Fast Track process:

- Comment cards or complaint forms;
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders;
- One-time or panel discussion groups;
- Moderated, un-moderated, in-person, and/or remote-usability studies;
- Advance testing of non-controversial information collections, including Federal forms, as part of focus groups, inperson observations of users' perceptions of the forms and questions (cognitive testing), web-based experiments, and randomized controlled experiments to refine questions;
- Post-transaction customer surveys (e.g., by call centers);
- On-line surveys; and
- Customer satisfaction qualitative surveys (e.g., those designed to detect early warning signs of dissatisfaction with agency service delivery).

WHAT KINDS OF COLLECTIONS ARE GENERALLY NOT ELIGIBLE FOR THE "FAST TRACK" PROCESS?

Examples of collections that would generally not fall under the Fast Track process are:

- Surveys that require statistical rigor because they will be used for making significant policy or resource allocation decisions;
- Collections whose results are intended to be published in peer-reviewed journals or similar outlets;
- Collections that that impose significant burden on respondents or significant costs on the Government;
- Collections that are on potentially controversial topics or that raise issues of significant concern to other agencies;
- Collections that are intended for the purpose of basic research and that do not directly benefit the agency's customer service delivery; and

• Collections used for program evaluation and performance measurement purposes.

CAN WE SURVEY POTENTIAL CUSTOMERS AND OTHER STAKEHOLDERS UNDER THE "FAST TRACK" PROCESS?

Yes. As long as the purpose is improving current or future service delivery, and the collection satisfies the criteria outlined above, agencies may collect information from other stakeholders (such as past customers, potential future customers, co-regulators, and delivery partners) in order to inform service delivery improvement. The Fast Track process is not for the collections of information used for general program evaluation.

HOW DO WE KNOW IF OUR COLLECTION IS LOW-BURDEN AND THUS ELIGIBLE FOR THE "FAST TRACK" PROCESS?

Collections under the Fast Track process must be low-burden for respondents based on a consideration of the total burden hours for the collection, as well as in relation to the total number of respondents and the burden-hours per respondent. The following are illustrative examples:

- A fifteen-minute survey for 2,000 individuals would be low-burden because the total burden hours and the burdenhours per respondent would be small.
- Two-hour focus groups totaling one-hundred persons would be low-burden because the total burden hours and the total number of respondents would be small.
- A five-minute comment card filled out by 10,000 people would be low-burden because the total burden hours and the burden-hours per respondent would be small.

CAN A SERVICE-RELATED SURVEY BE ELIGIBLE FOR THE "FAST TRACK" PROCESS EVEN IF IT USES NUMERICAL SCALES IN ITS ANSWERS? (e.g., 1-5 scale where 1 is not satisfied and 5 is very satisfied)

Yes. Eligible surveys can use numerical scales such as rank-order or Likert scales.

CAN AN AGENCY COLLECT PERSONALLY IDENTIFIABLE INFORMATION (PII) UNDER THE "FAST TRACK" PROCESS?

Yes, but only in limited circumstances, such as when an agency collects contact information PII in order to have follow-up contact with a respondent (e.g., in order to provide remuneration, when appropriate, for participants of focus groups and cognitive laboratory studies). In those limited circumstances, the agency may collect PII (through the Fast Track process) only to the extent that its collection is a necessary element of the Information Collection Request. Moreover, in such circumstances, the agency must comply (as is also the case with other PII that the agency collects) with the applicable requirements, restrictions and prohibitions of the Privacy Act and other privacy and confidentiality laws that govern the agency's collection, retention, use, and/or disclosure of such PII.

Direct any question regarding Privacy Act considerations for a potential Fast Track survey to your bureau/office Privacy Act Officer.

MAY AN AGENCY PUBLISH RESULTS FROM ANY INFORMATION COLLECTIONS UNDER THE "FAST TRACK" PROCESS?

Generally, you may not publish collections approved under the Fast Track process. However, in some circumstances, agencies may have to make the information public. Where that occurs, agencies must communicate the qualitative nature of the results and indicate that they are not generalizable to the population of study.

WHAT ARE THE RULES FOR PAYMENT FOR RESPONDENTS OR PARTICIPANTS UNDER THE "FAST TRACK" PROCESS?

Under the Fast Track process, the same rules apply that govern payments in connection with other information collections. Please contact your bureau/office <u>Information Collection Clearance Officer</u> for more information. **HOW TO USE THE "FAST TRACK" PROCESS**

To use the Fast Track process, bureaus and offices must ensure the proposed information collection is consistent with the intent of the Fast Track Clearance; i.e., to improve existing or future service deliveries, products, or communication materials.

TIMELINES FOR REQUESTING APPROVALS

Submit approval requests under the Fast Track process to your bureau/office Information Collection Clearance Officer <u>at</u> least 15 calendar days prior to the first day the bureau/office plans to administer the survey instrument to the public.

REQUEST AND APPROVAL PROCESS STEPS

The steps in the Fast Track approval process are, as follows:

Step 1 - The requesting bureau/office completes the required justification form - DI-4011, "Request for Approval Under the DOI Generic Clearance for the Collection of Quantitative Feedback on Agency Service Delivery."

Step 2 - The bureau/office submits a copy of the entire approval package to the bureau/office <u>Information Collection</u> <u>Clearance Officer</u> (ICCO). The package must include:

- the completed DI-4011 that requires you to provide:
 - summary information, including a short description of the purpose and use of the information,
 - an estimate of the burden,
 - information about the respondents, and
 - a copy of the questions that will be asked in the form or format that they will be asked (e.g., if you are asking questions using a web-based application, the screen shots must be provided; if you are conducting a focus group, the script for the focus group facilitator must be provided).
- any introductory script used in contacting the public;
- all cover letters, postcard reminders or follow-up letters to be sent to potential respondents;
- the entire survey instrument;
- necessary Paperwork Reduction Act (PRA) compliance language inserted into the survey instrument (contact your bureau/office ICCO for assistance in developing the PRA language); and
- any other supporting materials.

Step 3 - The bureau/office ICCO will review/approve the package before submitting it electronically to the Departmental ICCO (D-ICCO) for review.

Step 4 - Once approved, the D-ICCO transmits the package to OMB for final approval.

Step 5 - OMB reviews the submission and notifies the D-ICCO of approval or necessary revisions.

Step 6 - Upon approval by OMB, the D-ICCO will notify the requesting bureau/office. If OMB attaches any special conditions to the approval, the Departmental Clearance Officer will inform the requesting bureau/office of the conditions required to conduct of the survey.

Should OMB reject the submission or have specific questions about the survey instrument, the D-ICCO will immediately inform the requesting bureau/office. The bureau/office may submit an appeal of the OMB decision to the Departmental Clearance Officer, in writing. The D-ICCO will submit the appeal to OMB and inform the bureau/office of the results.

Step 7- The bureau/office conducts the approved survey. Bureaus/offices may not make additions or changes to a survey instrument after OMB approves the request, even within the specific topic areas. However, bureaus/offices may delete questions after approval by OMB, if necessary.