

SUPPORTING STATEMENT

Part A

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

Date: 3/9/2021

United States Access Board

PART A: JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Orders 12862 and 13571 direct 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. Access Board (hereafter, "Access Board") seeks renewal of its existing generic clearance to collect qualitative feedback on the delivery of agency services and programs. By qualitative feedback, we mean information that provides useful insights on perceptions and opinions, rather than statistical surveys that would yield quantitative results that could be generalized to the population of study.

This collection of information is necessary to enable the Access Board to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving our delivery of agency services and programs. The information collected from customers and stakeholders will help to ensure that our services and programs are delivered effectively and efficiently. Feedback provided by individuals and entities will provide insights into customer and 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 public-facing agency programs requires ongoing assessment of service delivery in which feedback from customers and stakeholders plays a key role. The Access Board 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. The solicitation of feedback will target areas such as: timeliness and efficiency of service delivery; satisfaction with agency programs or delivery of services; and resolution of service-related complaints or problems. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. Were this information not collected, vital feedback from customers and stakeholders would be unavailable and, thus, could not be used to improve or inform the agency's delivery of services to the public.

The Access Board will only submit an information collection for approval under this renewed generic clearance if it meets the following conditions:

- Information gathered will only be used internally for general service improvement and program management purposes and is not intended for release outside the agency. (If released, procedures outlined in Item 16 (below) will be followed.);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions¹;
- Information gathered will only be used for qualitative purposes; the information will be neither designed nor expected to yield statistically reliable results that could be generalized to the population of study;
- Participation is voluntary;

¹ 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."

- The collection will be low-burden for respondents (when taking into account total burden hours, number of respondents, and burden-hours per respondent) and low-cost to both the agency and respondents;
- The qualitative feedback to be collected is non-controversial and will not raise issues of concern to other federal agencies;
- The collection is targeted at gathering feedback from individuals or entities who have experience with the agency's public-facing programs/services or may have experience with such programs in the near future; and
- If personally identifiable information (PII) is collected, collection will be minimized to essential information only and will not be retained beyond applicable agency or federal record schedules.

If a planned information collection fails to meet any of the conditions listed above, the Access Board will not seek fast-track approval under this generic clearance but will, instead, seek OMB approval through the normal PRA process.

For information collection requests that do meet the conditions for this renewed generic clearance, the Access Board will submit an electronic collection request to OMB, along with any needed supporting materials. Under the fast-track procedures laid out by OMB, these collection requests are automatically approved after five days, unless OMB identifies issues during this five-day period.

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

- Customer surveys/complaint forms;
- 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); and
- In-person observation testing (e.g., website or software usability tests).

The Access Board will designate an agency official to manage this renewed generic clearance, which, typically, is an attorney within the Office of General Counsel. This individual will independently review each proposed information collection prior to OMB submission to ensure compliance with the terms of this clearance.

3. Consideration Given to Information Technology

If appropriate, the Access Board will collect information electronically and/or use online collaboration tools to reduce the burden to respondents and/or improve accessibility.

4. Duplication of Information

No similar data are gathered or maintained by the Access Board or 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 information collections but the Access Board will minimize the burden on them by sampling, asking for readily available information, or using short, easy-to-complete information collection instruments.

6. Consequences of Not Conducting Collection

Without the feedback and other qualitative data collected through this generic clearance, the Access Board would not have timely and appropriate information from its customers and stakeholders to help improve or modify its public-facing programs and services.

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 C.F.R. § 1320.8(d), the Access Board published a 60-day notice for public comment in the *Federal Register* on December 17, 2020 (86 Fed. Reg. 81875). No comments were received.

9. Payment or Gift

The Access Board does not anticipate providing payment or other forms of remuneration to respondents for information collections under this generic clearance.

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, the Access Board will only include a pledge of confidentiality that is supported by authority established in statute or regulation, has disclosure and data security policies that are consistent with the pledge, and 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 to appropriate federal law or regulation.

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 under this generic clearance, including online feedback surveys. The annual burden hours requested (258) are based on the estimated number of responses we expect to receive annually from collections conducted under our renewed generic clearance. The estimated total annual time burden is the same as our existing generic clearance. Presented below in Table A are the estimated annual reporting burdens for our proposed renewal of this generic clearance:

Table A: Estimated Annual Reporting Burden

Type of Collection	Number of Respondents	Response Frequency	Average Response Time (mins.)	Total Time (hours)
Customer Feedback Surveys: Office of Technical and Information Services	3,830	1	4	255
Customer Feedback Surveys: ABA Compliance & Enforcement Program	40	1	4	3
Totals:	3,870	n/a	n/a	258

(Note: Estimates for annual time burdens are rounded to the nearest hour.)

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

We do not anticipate that information collections under this generic clearance will impose costs on the federal government other than modest staff time for development and administration of the collection instruments and analysis of results.

15. Reason for Change

Not applicable. This is a request for renewal of an existing generic clearance without change.

16. Tabulation of Results, Schedule, Analysis Plans

Feedback collected under this generic clearance will provide useful information, but will not yield (and is not aimed at yielding) data that can be generalized to the population of study. Findings will be used for general service improvement; they are not intended for publication.

Nevertheless, the Access Board may receive requests to release the information (e.g., required federal reports, congressional inquiries, Freedom of Information Act requests). The Access Board will disseminate its findings, when appropriate, in compliance with the agency's publicly posted guidelines for ensuring the quality of information disseminated to the public (<https://www.access-board.gov/about/policy/ig.html>). Any such releases will also include specific discussion of the limitations of the qualitative results.

17. Display of OMB Approval Date

The OMB control number and approval date will be appropriately posted on each approved information collection that is covered by this generic clearance. We are not requesting an exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

The information collection activities under this generic clearance will comply with the requirements in 5 C.F.R. § 1320.9. We do not anticipate seeking any exceptions.