

## A. JUSTIFICATION

### 1. Importance of Information

This is a request for a three-year generic clearance for the Corporation for National and Community Service, doing business as AmeriCorps (AmeriCorps) that will allow it to develop, test, and improve its survey and data collection instruments and methodologies. The procedures utilized to this effect include, but are not limited to, tests of various types of survey and data collection operations through focus groups, cognitive laboratory activities, pilot testing, field testing, exploratory interviews, experiments with questionnaire design, and usability testing of electronic data collection instruments.

AmeriCorps is requesting the generic clearance in order to test new or proposed methodologies for surveys and data collection activities. We believe the generic clearance will be a helpful vehicle for evaluating questionnaires/assessments and various other data collection procedures related to these new or changing data collections.

In the past, AmeriCorps has approached design and testing either through projects that obtained full OMB clearance for data collection or AmeriCorps has relied on convenience samples of nine or fewer persons to provide input and feedback on survey design and data collection methodologies. Neither of these approaches meets AmeriCorps' needs to develop and implement more rigorous testing procedures. Seeking full OMB clearance prior to testing instruments causes delays to AmeriCorps achieving its timeliness objectives for collections. Reliance on nine or fewer persons does not provide a basis for conducting any type of test and the data from nine or fewer have no generalizability.

The information collected via these mechanisms, while still helpful, was nonetheless somewhat limited in its ability to detect and diagnose problems with the instruments and the procedures being tested. The generic testing clearance will allow AmeriCorps to take advantage of a variety of methods that are useful for identifying questionnaire/assessment and procedural problems, suggesting solutions, and measuring the relative effectiveness of alternative solutions. Through the use of these techniques, when employed routinely in the testing phase of AmeriCorps data collections, questionnaires and assessments can be simplified for respondents, respondent burden can be reduced, procedures for the collection of administrative data can be streamlined, and the quality of the questionnaires and assessments used in continuing and one-time surveys and assessments can be improved. Thus, an increase in the quality of the data collected can be achieved as well.

AmeriCorps is requesting a three-year generic clearance for pretesting, during which AmeriCorps will provide periodic reports on pretesting activities. The pretesting activities conducted under this generic clearance will be for development work only. These development activities will include such things as investigation of item types, small scale tests to test appropriate access and retrieval methods for various types of administrative data, research about mode of administration (telephone, paper and pencil, computer-based, mail-out and mail-in, etc.), methodology of questionnaires and assessments, and testing of items.

This clearance package is intended to serve as a request for generic clearance. In this document we have provided a description of the scope of possible activities that might be covered under this clearance. The requested clearance is important to AmeriCorps' use of pretesting activities, because of the length of time required to plan the activities.

The specific methods proposed for coverage by this clearance are described below. Also outlined are the procedures AmeriCorps plans to put in place for keeping OMB informed about the identity of the surveys and the nature of the research activities being conducted.

The methods proposed for use in questionnaire and assessment development are as follows:

Pilot testing. For the purposes of this clearance, we are defining pilot tests as small-scale data collection efforts conducted among either purposive or representative samples, for which evaluation of the questionnaire and/or procedures is the main objective. AmeriCorps will only publish research and development (R&D) and methodological reports on the results of these pilot tests but will not publish statistical reports or data sets based on the substantive findings.

Pilot tests are an essential component of this clearance package because they serve as the vehicle for investigating basic item properties for new or redesigned data collection efforts, such as reliability, validity, and difficulty, as well as feasibility of methods for standardized administration of forms. Under this clearance a variety of surveys will be pretested, and the exact nature of the surveys and the samples is undetermined at present.

However, due to the smaller nature of the tests, we expect that some will not involve representative samples. In these cases, samples will basically be convenience samples, which could be limited to specific geographic locations, specific AmeriCorps programs, may involve expired rotation groups of a current survey, are known to have specific aggregate demographic characteristics, etc. The needs of the particular sample will vary based on the content of the survey being tested, but the selection of sample cases will not be completely arbitrary in any instance

Behavior coding. This method involves applying a standardized coding scheme to the completion of an interview or questionnaire, either by a coder using a tape-recording of the interview or by an in-person observer at the time of the interview. The coding scheme is designed to identify situations that occur during the interview that reflect problems with the questionnaire. For example, if respondents frequently interrupt the interviewer before the question is completed, the question may be too long. If respondents frequently give inadequate answers, this suggests there are some other problems with the question. Quantitative data derived from this type of standardized coding scheme can provide valuable information to identify problem areas in a questionnaire and can be used as a substitute for or as a complement to the traditional interviewer debriefing.

Interviewer debriefing. This method employs the knowledge of the employees who have the closest contact with the respondents. In conjunction with other methods, we plan to use this method in our field tests to collect information about how interviewers react to the survey

instruments, as well as understand problems and pitfalls encountered by interviewers during the interview.

Exploratory interviews. These may be conducted with individuals to understand a topical area and may be used in the very early stages of developing a new survey. It may cover discussions related to administrative records (e.g. what types of records, where, and in what format), subject matter, definitions, etc. Exploratory interviews may also be used to investigate whether sufficient issues are present related to an existing data collection to consider a redesign.

Respondent debriefing questionnaire. In this method, standardized debriefing questionnaires are administered to respondents who have participated in a field test. The debriefing form is administered at the end of the questionnaire being tested and contains questions that probe to determine how respondents interpret the questions and whether they have problems in completing the survey/questionnaire. This structured approach to debriefing enables quantitative analysis of data from a representative sample of respondents, to learn whether respondents can answer the questions, and whether they interpret them in the manner intended by the questionnaire designers.

Follow-up interviews or re-interviews. This involves re-interviewing or re-assessing a sample of respondents after the completion of a survey or assessment. Responses given in the re-interview are compared with the respondents' initial responses for consistency between responses. In this way, re-interviews provide data for studies of test-re-test reliability and other measures of data quality. In turn, this information aids in the development of improved, more reliable measures.

Split sample experiments. This involves testing alternative versions of questionnaires, and other collection methods, at least some of which have been designed to address problems identified in draft questionnaires or questionnaires from previous surveys. The use of multiple questionnaires, randomly assigned to permit statistical comparisons, is the critical component here; data collection can include mail, telephone, Internet, or personal visit interviews or group sessions at which self-administered questionnaires are completed.

Comparison of revised questionnaires against a control version, preferably, or against each other, facilitates statistical evaluation of the performance of alternative versions of the questionnaire. Split sample tests that incorporate questionnaire design experiments are likely to have a larger maximum sample size than field tests using other methodologies. Larger sample sizes will enable the detection of statistically significant differences and facilitate methodological experiments that can extend questionnaire design knowledge more generally for use in a variety of AmeriCorps data collection instruments.

Cognitive and usability interviews. This method involves intensive, one-on-one interviews in which the respondent is typically asked to "think aloud" as he or she answers survey questions. A number of different techniques may be involved, including asking respondents to paraphrase questions, probing questions asked to determine how respondents came up with their answers, and so on. The objective is to identify problems of ambiguity or misunderstanding, or other difficulties respondents have answering questions. This is frequently one of the early stages of revising a questionnaire.

Focus groups. This method involves group sessions guided by a moderator, who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups are useful for surfacing and exploring issues (e.g., confidentiality concerns) which people may feel some hesitation about discussing.

## **Procedures for Clearance**

Before testing activity is undertaken, AmeriCorps will provide OMB with a memo describing the study to be conducted and a copy of instrumentation and debriefing materials that will be used. Depending on the stage of instrumentation development, this may be a printed questionnaire, a set of prototype items showing each item type to be used and the range of topics to be covered by the questionnaire, or an interview script. When split sample experiments are conducted, either in small group sessions or as part of a field test, the different versions of the questionnaires to be used will be provided. For a test of alternative procedures, the description and rationale for the procedures will be submitted. A brief description of the planned field activity will also be provided.

Data collection for this project is permitted under the authorizing legislation for the questionnaire being tested. In most cases, data collection activities conducted by AmeriCorps will be authorized under the AmeriCorps enabling legislation, the National Community Service Act of 1995, as amended, and the Domestic Volunteer Service Act. At this time, it is not known whether other titles will be referenced for specific projects, as we do not know all of the survey questionnaires or data collection protocols that will be pretested during the course of the clearance. The authorizing statute will be specified in each information clearance.

## **2. Needs and Uses**

The information collected in this program of developing and testing questionnaires and other data collection protocols will be used by staff from AmeriCorps to evaluate and improve the quality of the data in the surveys and assessments that are ultimately conducted. None of the data collected under this clearance will be published for its own sake.

Because the questionnaires being tested under this clearance are still in the process of development, the data that result from these collections are not considered official statistics of AmeriCorps or other Federal agencies. Data will not be made public, except it can be included in research methods reports prepared for sponsors inside and outside of AmeriCorps. The results may also be prepared for presentations or publications on survey methodology at professional meetings or in professional journals.

Information quality is an integral part of the pre-dissemination review of the information disseminated by AmeriCorps. Information quality is also integral to the information collections conducted by AmeriCorps and is incorporated into the clearance process required by the Paperwork Reduction Act.

AmeriCorps anticipates conducting testing work under this Generic IC for a number of projects, including but not limited to the following:

**Member Exit Survey:** AmeriCorps national service programs have the potential to positively impact both communities in which members serve and the AmeriCorps members themselves. The AmeriCorps Exit Survey is a web-based survey taken by members when they exit their term of service in AmeriCorps or later when re-entering the online member portal (e.g., to access their Segal education award for completing their term of service). The exit survey includes topics such as motivation for joining, effectiveness of training and orientation, satisfaction with the AmeriCorps experience, and perceptions of the impact of service. AmeriCorps seeks to refine the survey items and its administration with the goal of improving data quality

**Member Alumni Survey:** AmeriCorps seeks to strengthen our capacity to evaluate members' long-term civic and career outcomes by developing a sustainable research strategy. In addition, we want to strengthen the evidence base for member outcomes through comparisons with groups of individuals who have demonstrated similar levels of commitment to public service but who serve through other types of opportunities. By making more meaningful comparisons the agency expects to learn about the types of national service programs and policies that most influence the long-term civic engagement and career choices of former members.

### **Program Evaluations**

AmeriCorps conducts various program evaluations of its key initiatives. Interviews, surveys and focus groups are often central to the evaluation designs. Focus groups are often desirable for identifying issues and themes worthy of deeper exploration through individual interviews or surveys. Interviews and surveys of stakeholders responsible for implementing AmeriCorps initiatives are typical methods for gathering data about the program. Assessments of program beneficiaries are also central and typically rely on surveys.

### **3. Use of Information Technology**

When the survey or assessment being pretested employs automated methods for its data collection, the research conducted under this submission will also use automated data collection techniques. This clearance offers AmeriCorps the opportunity to try innovative technologies that can reduce burden, improve data quality and reliability, and increase the use of information technology.

### **4. Efforts to Identify Duplication**

This research does not duplicate any other questionnaire design work being done by AmeriCorps or other Federal agencies. The purpose of this clearance is to stimulate additional research, which would not be done under other circumstances due to time constraints. This research will involve collaboration with staff from other agencies that are sponsoring surveys conducted by AmeriCorps, when applicable. The research may also involve joint efforts with staff from other Federal laboratory facilities. All efforts would be collaborative in nature, and no duplication in this area is anticipated.

To the maximum extent possible, we will make use of previous information, reviewing results of previous evaluations of survey data before we attempt to revise questionnaires. However, this information is not sufficient to refine our survey questionnaires and assessments without conducting additional research.

## **5. Minimizing Burden**

This research will be designed as relatively small-scale data collection efforts. This will minimize the amount of burden required to improve questionnaires, data collection instruments, and procedures, to test new ideas, and refine or improve upon positive or unclear results from other tests. The results of the research conducted under this clearance are expected to improve the methods and instruments utilized in full scale studies and thereby improve information quality while minimizing burden to respondents.

## **6. Consequences of Less Frequent Collection**

This clearance involves questionnaire and data collection research and development activities for each survey or data collection connected with the clearance. If this project were not carried out, the quality of the data collected would suffer. In addition, activities covered under this clearance will allow for more specific and precise calculation of burden hours and costs associated with survey and data collection efforts conducted by AmeriCorps.

## **7. Special Circumstances**

All the guidelines listed in the OMB guidelines are met. There are no special circumstances.

## **8. Consultations outside the Agency**

The 60-day Federal Register Notice was published on November 30, 2020 and the 30-day Federal Register Notice was published on March 4, 2021. No public comments have been received in response to this notice.

Consultation with staff from other Federal agencies that sponsor surveys conducted by AmeriCorps will occur in conjunction with the testing program for the individual survey. These consultations will include discussions concerning potential response problems, clarity of questions and instructions, and other aspects of respondent burden. Additional efforts to consult with potential respondents to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken as part of the testing that is conducted under this clearance.

## **9. Paying Respondents**

While no currently proposed projects involve the use of incentives, AmeriCorps may develop other projects where incentives could be used. AmeriCorps may offer up to \$40 for in-person cognitive interviews and up to \$75 for focus group participation taking place in-person at a facility (i.e., not online focus groups). We also may propose incentive experiments in limited cases. All incentive proposals will be requested per memo to OMB requesting specific piloting/testing activities.

## **10. Assurance of Confidentiality**

Responses to these pilots and tests will remain private to the extent permitted by law

## **11. Justification for Sensitive Questions**

It is possible that some potentially sensitive questions may be included in questionnaires that are tested under this clearance. One of the purposes of the testing is to identify such questions, determine sources of sensitivity, and address concerns related to those questions, insofar as possible, before the actual survey is administered. Justification for any sensitive questions included in a project covered by this generic IC will be included in the individual project submissions.

## **12. Estimate of Hour Burden**

We estimate that the number of people involved in our exploratory, field test, pilot, cognitive, and focus group work will average about 350 respondents per year. We estimate the average annual burden hours across all proposed project activities will be 175 hours.

A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are not thoroughly known at this time. However, we can project that our activities will likely include testing items and data collection modes, and conducting pilot tests, cognitive labs or interviews, exploratory interviews, re-interviews, behavior coding, and focus groups.

## **13. Estimate of Cost Burden**

It is very difficult to anticipate the actual number of participants, length of interview, and/or mode of data collection for the work to be conducted under this clearance over the entire three-year clearance period. Without that information, it is not possible to estimate in advance the cost burden for respondents. We will include information about costs in the individual submissions.

## **14. Cost to Federal Government**

It is very difficult to anticipate the actual number of participants, length of interview, and/or mode of data collection for the work to be conducted under this clearance over the entire three-year clearance period. Without that information, it is not possible to estimate in advance the cost of the work to the Federal Government. Costs associated with each individual project will be covered by the statistical unit conducting the research and will come from their data collection budgets. We will include information about costs in the individual submissions.

## **15. Reason for Change in Burden**

There is no change in burden based on our prior use of this generic information clearance.

## **16. Project Schedule**

This research program is for questionnaire and procedure development purposes. Data tabulations will be used to evaluate the results of questionnaire testing. The information collected in this effort will not be the subject of estimates or other statistics in AmeriCorps reports; however, it may be published in research and development reports or included as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this research may be prepared for presentation at professional meetings or publication in professional journals. Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to be conducted more or less continuously throughout the duration of the clearance.

**17. Request to Not Display Expiration Date**

No exemption is requested.

**18. Exceptions to the Certification**

There are no exceptions to the certification.