

**Supporting Statement for
"Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery"
OMB Control Number 0955-0003**

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, **Office of the Secretary, Office of the National Coordinator for Health Information Technology (ONC), HHS** (hereafter "the Agency") seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. Qualitative feedback means 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, 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 submit a collection for approval under this generic clearance if it meets only 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 (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions¹;
- 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 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 Agency has established a manager/managing entity to serve for this generic clearance who 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.

The Agency has used the current clearance to evaluate the 2019 Interoperability Forum event. Overall event evaluations and individual session evaluations were conducted. The overall event evaluation

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.”

asked questions about the information provided before the event, if the track themes and schedules covered the current barriers and solutions in health information technology, if attendees visited the exhibits and enjoyed the information provided, if the event met expectations, and if the event would be recommended to others. The sessions evaluation asked specific questions about the individual sessions including if objectives were met, topics were relevant, presenters were engaging, and if the information shared will be useful in current or future work. Results from both evaluations were presented to Agency leadership and were used to plan the 2020 event.

Additional burden hours and responses were added to the clearance to accommodate a project evaluating a tool available from ONC called the Security Risk Assessment Tool. The tool is available from healthit.gov. The SRA Tool is a desktop application provided by ONC and the Office for Civil Rights. It is designed to help small to medium sized practices and organizations conduct a security risk assessment as required by the HIPAA Security Rule. This survey is designed to collect feedback about the SRA Tool from its users. Through feedback from this survey, we hope to learn where users are having trouble using the tool and find areas for improvement. This will guide the development of new features, bug fixes, improved instructions, and training.

3. Consideration Given to Information Technology

If appropriate, agencies will collect information electronically and/or use online collaboration tools to reduce burden.

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

On Feb. 22, 2021, a 60-Day Federal Register Notice was published at 86 FR 10589. No comments were received.

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

Confidentiality will not be pledged unless the Agency is supported by authority established in statute or regulation. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge. Otherwise, data will be kept private to the extent allowed by 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 total burden hours requested (1,167) is based on the number of collections we expect to conduct over the requested period for this clearance that is 3 years.

Estimated Total Reporting Burden – 3 Years			
No. of Respondents	Number of Responses per Respondent	Hours per Response	Total Burden Hours
10,000	1	7/60	1,167

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the Federal Government is approximately \$350,000 total, \$150,000 annually. These costs are comprised of: recruitment and outreach efforts, data collection and analysis, staff labor, and operational expenses.

15. Reason for Change

The number of respondents and total burden hours have decreased in this revision from 17,847 responses to 10,000 and from 1,610 hours to 1,167. Multiple virtual events are anticipated during the next three years, so the opportunities for collecting service delivery feedback have increased, yet we do not expect any large evaluations, leading to the adjustment in respondents and burden hours.

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 and 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 when appropriate, strictly following the Agency's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of the qualitative results discussed above.

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.