

**Department of Transportation  
Federal Motor Carrier Safety Administration**

**Supporting Statement Part A  
Generic Information Collection Submissions for Generic Clearance for the  
Collection of Qualitative Feedback on Agency Service Delivery**

**SUMMARY**

- This is an ICR renewal without change to the burden estimate.
- No information collection instruments are being submitted at this time.

**INTRODUCTION**

In accordance with the Paperwork Reduction Act of 1995, the Federal Motor Carrier Safety Administration (hereafter “the agency” or FMCSA) announces its plan to submit the Information Collection Request (ICR) described below to the Office of Management and Budget (OMB) for its review and approval and invites public comment. The agency requests approval to renew an existing ICR titled: “Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery,” which will expire on August 31, 2021. The Agency estimates the annual burden of the information collections to be 2,233 hours.

**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, FMCSA seeks OMB approval to renew an existing 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 such feedback is not in the form of statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable FMCSA to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improve our 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 and stakeholder perceptions, experiences, and expectations. The gathered data will provide early warnings of issues with our service, and will help us focus our 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. They will also allow feedback to contribute directly to the improvement of program management.

## 2. Purpose and Use of the Information Collection

Improving FMCSA's programs requires an ongoing assessment of service delivery. In order to achieve this objective, FMCSA seeks to conduct a 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 our service delivery. 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. Respondent feedback will be used to iteratively plan and inform our efforts to improve and/or maintain our quality of service offered to the public. If this information is not collected, FMCSA will lack vital feedback from our customers and stakeholders on FMCSA's services needed to comply with Executive Order 12862.

The agency will only submit a collection for approval under this generic clearance if it meets 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; (procedures outlined in Question 16 will be followed if information is to be released);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;<sup>1</sup>
- 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 had 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.

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<sup>1</sup> As defined in OMB, as well as Department of Transportation, information quality guidelines, "influential" information 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" (67 FR 8460 (Feb. 22, 2002)).

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 and 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. It 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**

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

### **4. Duplication of Information**

Information collections will be undertaken only when 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 businesses or other small entities may be involved in these efforts. 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 Collections**

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. Compliance with 5 CFR 1320.8**

A 60-day notice for public comment was published on February 12, 2021 (86 FR 9422). The comment period for that notice closed on April 13, 2021 and a total of one comment was received. The comment was received from the National School Transportation Association, who was supportive of the efforts contained within this ICR. No changes were made to the ICR based on this comment.

FMCSA performs the information collection outlined in Table 1 to better understand the views of people who attend the annual FMCSA ART forum, an event that allows FMCSA to report on agency activities and engage with stakeholders. Since the survey for this event was short and voluntary, it was a simple way to assess the effectiveness of the forum in achieving these goals.

FMCSA ensures that all customer satisfaction surveys under this ICR are targeted to a wide range of customers and stakeholders to ensure that FMCSA hears from all impacted communities, including typically marginalized or unheard members of the commercial motor carrier industry (e.g., women, minorities, etc.) and related organizations.

FMCSA frequently consults with representatives of organizations from whom information is obtained or who must compile records. FMCSA will continue to consult with stakeholders to ensure that information collections are appropriate and not burdensome.

## **9. Payments or Gifts to Respondents**

The agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback, except for focus groups and cognitive laboratory studies.

In the case of in-person cognitive laboratory and usability studies, the agency may provide stipends of up to \$40. In the case of in-person focus groups, the agency may provide stipends of up to \$75. If respondents participate in these kinds of studies remotely, via phone or internet, any proposed stipend will be justified to OMB and must be considerably less than that provided to in-person study respondents, who have to travel to the agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the agency will provide OMB with additional justifications in the request for clearance of these specific activities.

## **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 will be used to collect information from respondents. Table 1 provides the breakout of the information collection instrument, the expected number of respondents per instrument, the number of responses per respondent, and the expected time for each respondent to complete one response. The total number of respondents and responses are based on the previous information collections conducted from 2018, 2019, and 2020. FMCSA uses these respondent numbers to project the total number of respondents expected for years 2021, 2022, and 2023. For the annual burden associated with this ICR, see Table 2.

**Table 1. Annual Respondent Total Burden Hour Estimate for One Year<sup>2</sup>**

<b>Information Collection Instrument</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Hourly Burden per Response (minutes)</b>	<b>Total Annual Burden (hours)</b>	<b>Total Annual Burden Costs (\$)</b>
	(a)	(b)	(a × b = c)	(d)	((c × d)/60 minutes = e)	(e × \$38.6)
Ia. ART Forum for Topic Selection	120	1	120	10	20	772
Ib. ART Forum Evaluation (paper-based)	25	1	25	15	6.25	241.25
Ic. ART Forum Evaluation (web-based)	25	1	25	15	6.25	241.25
2a. Customer Satisfaction (web pages and web-enabled resources)	6,000	1	6,000	5	500	19,300

<sup>2</sup> Instrument total number of respondents, response and time duration are based on the results from the previous iteration of this ICR.

2b. Customer Satisfaction (technical guidance products)	1,000	4	4,000	15	1,000	38,600
2c. Customer Satisfaction (products and services)	1,500	1	1,500	20	500	19,300
3a. Research & Technology (R&T) Activity Effectiveness	200	1	200	30	100	3,860
3b. R&T Website Use and Satisfaction	400	1	400	15	100	3,860
<b>Total</b>	<b>9,270</b>	<b>11</b>	<b>12,270</b>	<b>125</b>	<b>2,233</b>	<b>86,175</b>
<i>Average per instrument<sup>3</sup></i>	1,159	1.375	1,534	15.625	279	10,772

Note: Annual total and average burden hourly values may not match due to rounding.

**Table 2. Total Hourly Burden Estimate for Respondents**

<b>Year</b>	<b>Total Number of Respondents</b>	<b>Total Number of Responses</b>	<b>Total Annual Burden (hours)</b>
2021	9,270	12,270	2,233
2022	9,270	12,270	2,233
2023	9,270	12,270	2,233
<b>Total</b>	<b>27,810</b>	<b>36,810</b>	<b>6,699</b>
<i>Average</i>	9,270	12,270	2,233

In conclusion, total annual hourly burden to respondents is 2,233 hours per year.

The total annual burden cost for this collection is estimated to be \$86,175, as shown in table 1. The average hourly employer cost for employee compensation as reported by the Bureau of Labor Statistics, \$38.60,<sup>4</sup> is representative of those responding to the information collections. Wages and salaries cost employers \$26.53, while benefits cost \$12.07. This figure is multiplied

<sup>3</sup> Total divided by 8 instruments.

by the estimated burden hours of each of the information collections then the burden hour costs is summed for the eight information collections, which results in an annual cost of \$86,175.

**Estimated Total Annual Burden Costs:** \$86,175[(20 hours for ART Forum for Topic Selection × \$38.60) + (6.25 hours for ART Forum Evaluation (paper-based) × \$38.60) + (6.25 hours for ART Forum Evaluation (web-based) × \$38.60) + (500 hours for Customer Satisfaction (web pages and web-enabled resources) × \$38.60) + (1000 hours for Customer Satisfaction (technical guidance products) × \$38.60) + (500 hours for Customer Satisfaction (products and services) × \$38.60) + (100 hours for Research & Technology (R&T) Activity Effectiveness × \$38.60) + (100 hours for R&T Website Use and Satisfaction × \$38.60) = \$86,175].

### 13. Costs to Respondents

FMCSA does not separately account for capital, maintenance or record keeping costs within this ICR. The information collections referenced in Table 1 are conducted in-person or online. Previous iterations of the information collection instruments included physical surveys and resulted in non-labor costs such as postage stamps. However, since 2018 all physical surveys have been discontinued and there is no longer an associated non-labor cost. FMCSA also does not associate any cost with respondent record keeping, and there are no fees associated with the collections in this ICR.

### 14. Costs to Federal Government

The Analysis, Research, and Technology (ART) Forum is normally held annually in conjunction with the Annual Transportation Research Board (TRB) Meeting in Washington, DC. The FMCSA *Topic Selection* is a survey distributed to forum stakeholders to gather information on the annual forum topic. Following the ART Forum presentation, the session concludes with the distribution of a paper copy of the *Post Evaluation* survey to forum participants. In addition, an online version of the survey is distributed to registered forum participants. These surveys are anticipated to be conducted by an FMCSA ART staff member at the GS-13 or GS-14 level. It is anticipated the surveys will take approximately 120 hours per year. According to OPM wage data, a GS-13 labor category has a median hourly wage rate of \$56.57 while a GS-14 has a rate of \$66.85<sup>5</sup> in Washington, DC. Taking the average of these two rates, the FMCSA staff member is anticipated to have an average labor wage rate of \$61.71  $(\$56.57 + \$66.85) \div 2 = \$61.71$ . In addition to these wage costs, other costs such as benefits and overhead need to be factored into the hourly wage costs to arrive at a total compensation cost per hour. To be consistent with

<sup>4</sup> Bureau of Labor Statistics. Employer Costs for Employee Compensation—June 2020, [www.bls.gov/news.release/pdf/ecec.pdf](http://www.bls.gov/news.release/pdf/ecec.pdf) (accessed November 17, 2020).

<sup>5</sup> Office of Personnel Management, (2020). 2020 General Schedule (GS) Locality Pay Tables. Washington, Baltimore, Arlington, DC-MD-VA-WV-PA, Available at <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/general-schedule/> Averages based on GS-13 and GS-14 steps 1 through 10 rates. Accessed October 26, 2020.

other FMCSA information collections, FMCSA multiplies the average hourly wage cost by a load factor of 1.28.<sup>6</sup> The resulting loaded hourly compensation rate is \$78.99 ( $\$61.71 \times 1.28 = \$78.99$ ). The cost to the federal government for the annual ART TRB surveys is \$9,478.80 ( $\$78.99 \times 120 = \$9,478.80$ ).

The customer satisfaction surveys are designed, developed, and implemented with the support of a contracted mid-level coordinator. A mid-level project coordinator best aligns with the Department of Labor's (DOL) *Assistant Statistician* labor category as defined by the Occupational Employment and Wages Estimates with a median wage rate of \$23.97<sup>7</sup>. To develop the loaded wage rate, FMCSA takes the total cost per compensation in the DOL's Employer Cost for Employee Compensation (ECEC)'s *Management, Professional, and Related* of \$62.05 and divides by the aggregated industry hourly wages of \$42.33. This calculation provides a load factor of 1.47 ( $62.05 \div 42.33 = 1.47$ ). Multiplying the load factor by the wage cost results in a total cost per hour rate of \$35.24 ( $\$23.97 \times 1.47 = \$35.24$ ). FMCSA anticipates that the customer satisfaction surveys will take 80 hours to develop, 10 hours to administer, and 40 hours to analyze and present to stakeholders, for a total of 130 hours. This results in a contractor cost of \$4,581.20 ( $\$35.24 \times 130 = \$4,581.20$ ). In addition, an FMCSA ART staff member will act as the project's contracting officer's representative (COR). FMCSA assumes that the COR will have the same labor cost listed above. The COR is expected to spend approximately 10 percent of the project hours or 13 hours to oversee the *Assistant Statistician*. This results in an incremental cost of \$1,026.87 ( $\$78.99 \times 13 = \$1,026.87$ ). The total annual cost for the customer satisfaction surveys is \$5,608.07 ( $\$4,581.20 + \$1,026.87 = \$5,608.07$ ).

In addition to the forum and customer satisfaction survey, ART also hosts an annual Research & Technology (R&T) Activity Effectiveness survey. The survey is conducted by the same ART staff person as listed above with a total wage rate of \$78.99. The survey is anticipated to take 60 annual hours. The cost of this survey is \$4,739.40 ( $\$78.99 \times 60 = \$4,739.40$ ).

In conclusion, the annual cost to the federal government is \$20,695, for the above described surveys. The annual cost is broken out in Table 3. The three-year total cost covered by this ICR is \$63,216 as broken out in Table 4.

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<sup>6</sup> Consistent with previous iteration of ICR.

<sup>7</sup> A mid-level Project Coordinator best aligns with the Department of Labor's *Assistant Statistician* labor category as defined by the Occupational Employment and Wages Estimates (OEWE), May 2019, NAICS code: 43-9111.. Accessed November 2, 2020



**Table 3. Total Estimated Costs to Federal Government by Year**

Information Collection Instrument	Total Annual Burden (hours)	Cost per hour	Total Cost (dollars)
	(a)	(b)	$a \times b = (c)$
TRB ART Forum Surveys-ART Staff member	120	\$78.99	\$9,478.80
<i>Sub-total</i>	120	-	\$9,478.80
Customer Satisfaction Surveys - Assistant Statistician	130	\$25.24	\$4,581.20
Customer Satisfaction -ART Staff member	13	\$78.99	\$1,026.87
<i>Sub-total</i>	143	-	\$5,608.07
Research &Technology (R&T) Activity Effectiveness Survey ART Staff member	60	\$78.99	\$4,739.40
<i>Sub-total</i>	60	-	\$5,608.07
<b>Total</b>	<b>323</b>	<b>-</b>	<b>\$20,695</b>

Note: Annual burden total and average values may not match due to rounding.

**Table 4 Total Cost to the Federal Government**

Year	Total Annual Burden (hours)	Total Cost (dollars) $A = A_{-1} \times (1 + 0.0181\%)$
2021	323	\$20,695
2022	323	\$21,070
2023	323	\$21,451
<b>Total Cost</b>	<b>969</b>	<b>\$63,216</b>
<b>Average Cost</b>	<b>323</b>	<b>\$21,072</b>

Year	Total Annual Burden (hours)	Total Cost (dollars) $A = A_{-1} \times (1 + 0.0181\%)$
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Note: Annual total and average burden values may not match due to rounding.

**15. Reason for Change**

The total annual burden hours being requested for this renewal remains the same at 2,233 hours per year. The total annual burden costs were not calculated in the previous ICR submission, and are now estimated to be \$86,175. The burden cost to the Federal Government is calculated as \$21,072 cost per year. This is a decrease from the previous ICR submittal because the previous iteration overestimated the hours needed to collect information.

**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, 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 or Freedom of Information Act requests), the agency will disseminate the findings when appropriate, strictly following the agency’s “Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated to the Public by the Department of Transportation,” and will include specific discussion of any limitations 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**

No exceptions to the certification statement are requested.