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

~~August 2021~~

Part A: Justification

OMB No. 1910-5160

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A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. To work continuously to ensure that our programs are effective and meet our customers' needs, DOE seeks to obtain OMB approval of a 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 are not statistical surveys which yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable DOE 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 helps ensure that users have an effective, efficient, and satisfying experience with the Department's programs. This feedback provides 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 allow for ongoing, collaborative and actionable communication between DOE and its customers and stakeholders. It also allows feedback to contribute directly to the improvement of program management.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

Improving programs require the ongoing assessment of service delivery, by which we mean the 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. DOE 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 targets areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses are 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 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 (if released, procedures outlined in Question 16 will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions ¹;
- 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, DOE 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).

Under the 2018-2021 approval, DOE obtained approval for 9 fast track collections under this generic clearance, with a total burden of 5,598 respondents and 955 hours.

IC Title

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.”

US DOE Office of Small and Disadvantaged Business Utilization Customer Service Feedback Survey
DOE Insider Threat Stakeholder Satisfaction Survey
DOE Office of Legacy Management Stakeholder Satisfaction Survey
LM Public Communications Survey
NA-IM Student Feedback Survey
LPS User Survey
SETO 2020 Peer Review Reviewer Checkout Questionnaire
Office of the CFO Customer Service Survey
CISO Roundtable Survey
Total Burden Used
Total Burden Approved
Total Burden Left

DOE will conduct a review of each information collection to ensure compliance with the terms of the clearance prior to submitting each collection to OMB.

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

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

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

No similar data are gathered or maintained by the Agency or are available from other sources known to DOE.

A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small business or other small entities may be involved in these efforts but DOE will minimize the burden on them by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

Without these types of feedback, DOE will not have timely information to adjust its services to meet customer needs.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;**
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**
- (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;**
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- (g) that includes a pledge of confidentiality that is not supported by authority established in statute of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 18, 2021 (Volume 86, Number 94, Page 26910). No comments were received.

The Department will publish a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on September 1, 2021.

Various programs collecting information under this umbrella approval have consulted with the public informally on their views regarding this collection. As these collections are low burden, no issues were raised regarding them.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

DOE will not provide payment or other forms of remuneration to respondents.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

If a confidentiality pledge is deemed useful and feasible, DOE 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.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions will be asked that are of a personal or sensitive nature.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

A variety of instruments and platforms will be used to collect information from respondents. The total burden hours (74,000) and responses (200,000) are based on an average of the collections from the last three approval cycles, and the number of collections we expect to conduct over the requested three year approval period for this clearance.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
		200000	200000	0.37	74000	1
TOTAL		200,000	200,000		74,000	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

DOE estimates a cost to respondents of \$3,796,200. The hourly wage rate used is based on a BLS rate for private industry workers (\$36.64), plus a 1.4 multiplier for benefits (\$51.30).

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Private	74000	51.30	\$3,796,200
TOTAL	74,000		\$3,796,200

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

No costs are anticipated.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated total cost to the Federal government for the generic surveys is \$148,269.10. This estimate was based on a review of costs associated with generic clearance surveys over the last three approval periods. DOE estimates that 500 hours will be spent by Federal staff over the next 3 years, in addition to \$100,000 for equipment.

GS-14, Step 5: \$66.54, plus 1.6 multiplier for benefits, equals \$106.464 (Total: \$15,969.60)

GS-13, Step 5: \$56.31, plus 1.6 multiplier for benefits, equals \$90.10 (Total: \$13,515)

GS-15, Step 5: \$78.27, plus 1.6 multiplier for benefits, equals \$125.23 (Total: \$18,784.5)

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

The decrease in burden hours is due to a revised estimation of burden based on previously collected information.

Table A3. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	200,000		-100,000	300,000
Total Time Burden (Hr)	74,000		-37,000	111,000
Total Cost Burden	\$3,796,200		+\$3,796,200	\$0

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

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 DOE does not intend to publish its findings, we may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). DOE 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.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

We are requesting no exemption.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

These activities comply with the requirements in 5 CFR § 1320.9.

