

# 11 SUPPORTING STATEMENT A FOR PAPERWORK REDUCTION ACT SUBMISSION

## DOI Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery OMB Control Number 1090-0011

**OMB Terms of Clearance:** None. The updates made to this document in support of the No Material/Nonsubstantive Change Request are highlighted in yellow (pg. 3).

### **INTRODUCTION:**

The Department of the Interior (DOI) is requesting a three-year extension of Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery, originally approved by the Office of Management and Budget (OMB) in 2012. The Generic Clearance enables Interior bureaus and offices to collect information to improve the services and products that DOI provides to the public and thus better carry out part of its statutory mission.

The existing Generic Clearance covers all of the Interior bureaus and offices in DOI and provides centralized oversight for all feedback on agency service delivery surveys within Interior. The DOI Office of Policy Analysis will continue to conduct the necessary quality control, including assuring that each survey instrument is consistent with the guidelines of the Programmatic Clearance.

### **1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

Executive Order 12862, "Setting Customer Service Standards," directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. Executive Order 13571 on "Streamlining Service Delivery and Improving Customer Service" requires Federal agencies to establish "mechanisms to solicit customer feedback on Government services." In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Department of the Interior (hereafter "the Agency") 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 that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the Agency to gather 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.

Additionally, in compliance with Office of Management and Budget's (OMB) August 9, 2012 memorandum titled "*Testing and Simplifying Federal Forms*," bureaus and offices will conduct advance testing of non-controversial information collections, including Federal forms, in order to:

- (1) Ensure they are not unnecessarily complex, burdensome, or confusing;
- (2) Obtain the best available information about the likely burden on the public (especially small businesses); and
- (3) Identify ways to reduce burden and increase simplification and ease of comprehension.

This advance testing of information collections would be conducted as part of focus groups, in-person observations of users' perceptions of the forms and questions (cognitive testing), web-based experiments, and randomized controlled experiments.

**2. 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. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

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 information collection tools will be limited to fifteen questions or less. All of the bureaus and offices of the Agency will have access to this generic clearance. 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 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<sup>1</sup>;
- Information gathered will be qualitative; 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;

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<sup>1</sup> 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."

- 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.
- Bureaus/offices will utilize this Suite of Questions when developing questionnaires for submission to the Office of Management and Budget (OMB) under the DOI “Fast Track” generic clearance. Questionnaires should be limited to no more than 15 questions (with a maximum of 2 open-ended questions) and should take no longer than 10-15 minutes to complete.

If these conditions are not fulfilled, the Agency will submit an information collection request to OMB for approval through the normal Paperwork Reduction Act (PRA) process.

To obtain approval for a collection that meets the conditions of this generic clearance, requestors will submit a completed Form DI-4011, “Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”, along with supporting documentation (e.g., a copy of the comment card) to their bureau/office Clearance Officer. The bureau/office Clearance Officer will review/approve the request and forward it to the Departmental Clearance Officer for final review and submission to OMB. 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;
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders;
- One-time or panel discussion groups;
- Moderated, un-moderated, in-person, and/or remote-usability studies;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys);
- Customer satisfaction qualitative surveys (e.g., those designed to detect early warning signs of dissatisfaction with agency service delivery); and
- Advance testing of non-controversial information collections, including Federal forms, as part of focus groups, in-person observations of users’ perceptions of the forms and questions (cognitive testing), web-based experiments, and randomized controlled experiments to refine questions (in accordance with OMB Memorandum “Testing and Simplifying Federal Forms”, August 9, 2012).

The Agency has established a manager/managing entity (the Office of Policy Analysis under the Assistant Secretary—Policy, Management and Budget) to serve for this generic clearance and 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.

Add 10-15 minutes, no more 15 minutes, 2 open ended? Time must not exceed 15 minutes per survey

**3. 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, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and**

**specifically how this collection meets GPEA requirements.**

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

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

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

**5. 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 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. 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, the Agency will not have timely information to adjust its services to meet customer needs.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* requiring respondents to report information to the agency more often than quarterly;
- \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- \* requiring respondents to submit more than an original and two copies of any document;
- \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;
- \* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- \* that includes a pledge of confidentiality that is not supported by authority established in statute or 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
- \* 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.

**8. 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 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Describe efforts to consult with persons outside the agency 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 reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

On November 20, 2020, we published in the *Federal Register* ([85 FR 74374](#)) a notice of our intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on January 19, 2021. We received no comments to that notice.

The DOI bureau information collection clearance officers were surveyed about the importance to their bureaus of continuation of this OMB programmatic approval. They all expressed strong support for its extension.

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

The Agency will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

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 needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies, 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. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The overarching ICR does not collect personally identifiable information. However, if the bureau/office Privacy Act Officer deems a submission under this generic clearance collects information subject to the provisions of the Privacy Act (5 U.S.C. § 552a), the corresponding

Forms DI-4011 will include the name and citation for the appropriate Systems of Records Notice.

**11. 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 the agency 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.

**12. 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, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- \* **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- \* **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.**

We use a variety of instruments and platforms to collect information from respondents. We based the estimated number of **annual responses (95,000)** and estimated **annual burden hours (15,833)** on the number of collections we expect to conduct over the requested period for this clearance. We estimate the approximate aggregate annual cost to respondents of **\$605,770.58** (15,833 hours x \$38.26/hour). We anticipate the average completion time for the various types of submissions under the control number to average approximately 15 questions or less and 10 minutes each.

We used the of Bureau of Labor Statistics (BLS) News Release [USDL-20-2266](#), December 17, 2020, Employer Costs for Employee Compensation—September 2020, to calculate the cost of the total annual burden hours. Table 1 of the News Release lists the hourly rate for all civilian workers as \$38.26, including benefits.

<b>Estimated Annual Reporting Burden</b>					
<b>Type of Collection</b>	<b>No. of Respondents</b>	<b>Annual Frequency per Response</b>	<b>Total Annual Responses</b>	<b>Time per Response</b>	<b>Total Annual Hours*</b>
<b><i>DI-4011, Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery</i></b>					
	95,000	1	95,000	10 minutes	15,833
<b>Totals:</b>	<b>95,000</b>		<b>95,000</b>		<b>15,833</b>

\*Rounded to match ROCIS

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

No non-hour dollar cost burdens are anticipated.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate the annual cost to the Federal government to be **\$191,094**. We based this on the average of Federal costs reported on actual submissions to OMB in calendar years 2019 and 2020.

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

During 2018 – 2021 (through early February), Interior’s actual burden for this collection was 66,354 responses totaling 9,151 burden hours. This request revises the previously requested and approved burden (125,000 responses and 28,605) to reduce it to 95,000 responses and 15,833 burden hours (see question 12). This lowered burden ceiling will still allow Interior to be responsive to bureau/office submissions without requesting unnecessarily high burden ceilings.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.**

**Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

Feedback collected under this generic clearance provides useful information, but it does not yield data generalized to the overall population. We will use the findings 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, 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. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We are requesting no exemption.

**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

These activities comply with the requirements in 5 CFR 1320.9.