

SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION

Generic Clearance for the Collection of Formative Research on Agency Service Delivery

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.

Headquartered at the Office of Management and Budget (OMB), the U.S. Digital Service's (USDS) mission is to deliver better government services through technology and design. In support of that mission, USDS engages directly with program applicants and beneficiaries, and other people who use or need to use the government systems and services we are helping to improve, and incorporates their feedback into our work and recommendations. By employing human-centered design practices like user research, USDS prioritizes the user's needs and learns what works as quickly as possible, saving time and money while improving services to the public. USDS deploys small, responsive groups of designers, engineers, product managers, and other specialists to work with and empower civil servants, working with many agencies simultaneously. These multi-disciplinary teams bring best practices and new approaches to support government modernization efforts, working fast, lean, and keeping the focus on the user.

USDS is funded by the Information Technology Oversight and Reform account, which provides funds "for the furtherance of integrated, efficient, secure, and effective uses of information technology in the Federal Government." The director of OMB may transfer ITOR funds to "one or more other agencies to carry out projects to meet these purposes." USDS uses design and technology to deliver better government services, partnering "directly with federal agencies to address improvements and new site launches of digital services for the Federal Government's most critical public-facing programs. USDS projects not only provide the public with better digital services, but also help streamline agency processes and save taxpayer dollars. USDS has established a strong track record in helping agencies to roll out IT services supporting the Government's most critical public-facing programs."¹ USDS is undertaking the collections at the discretion of the agency, and under the general authority of 44 U.S.C. 3504 and the Information Technology Oversight and Reform (ITOR) fund, as provided by the Consolidated Appropriations Act, 2021, Division E, Title II, Pub. L. 116-230.

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

¹ OMB, Budget of the U.S. Government, FY2021, Appendix, p. 1151, at <https://www.govinfo.gov/content/pkg/BUDGET-2021-APP/pdf/BUDGET-2021-APP.pdf>.

continuously to ensure that our programs are efficient and effective and meet the people's needs, USDS seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on service delivery across government. 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 a whole-of-government approach to garnering feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from the people engaging directly with government services will help ensure that users have an effective, efficient, and satisfying experience. This feedback will provide insights into the public's 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 Federal agencies and the public. It will also allow feedback to contribute directly to the improvement of program management.

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.

Under this generic clearance, USDS would engage in a variety of formative data collections with people who use or need to use government systems and services, such as program participants, practitioners, and service providers. The data collections would occur primarily through *Discovery Sprints*, which are short research projects designed to quickly understand complexities of systems or services in order to identify issues with service delivery, their root causes, and opportunities for improvement. Data collections would also occur during longer projects, as needed. USDS's research serves to provide further understanding of whether people engaging directly with government services are having an effective, efficient, and satisfying experience. USDS anticipates undertaking a variety of new research projects related to social safety net and general welfare programs, economic recovery efforts, healthcare, and more. Many Federal agencies and field offices find a need to learn more about the public's perceptions, experiences and expectations; early warnings of issues with service delivery; or areas where communication, training or changes in operations might improve delivery of products or services.

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. USDS 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 and efficiency of service delivery, satisfaction with agency programs or delivery of services, and resolution of service-related complaints or problems. Responses will be assessed to plan and inform efforts to improve or maintain

the quality of service offered to the public. Our findings will be used to facilitate a deeper understanding of people's needs and wants from public-facing services (e.g., a website; a form; a government benefit application).

The types of collections that this generic clearance covers include, but are not limited to:

- **Pre-study self-identification questionnaire:** Self-identification questionnaires, also called screeners, are commonly used to gather data from multiple people and determine applicability to other informative research methodologies. This information is used to help recruit people who have experience with a specific program for other UX research.
- **Unmoderated comment cards/complaint forms:** Unmoderated, quantitative and qualitative means to ask people questions and get answers about a site, product, experience, or topic. Often conducted indirectly, online.
- **Unmoderated qualitative user experience surveys (e.g., post-transaction surveys; opt-out web surveys):** A survey, often asking about customer satisfaction, that is triggered during the use of a site or product. May be open- or closed-ended.
- **Unmoderated information architecture evaluative methods (e.g., card sorts; tree tests):** Card sorting is a method for understanding how people conceptualize information and concepts by asking them to sort concepts into groups and label groups based on their mental models. Tree testing: a method for determining if the site structure and information architecture of a site or product makes sense to the people using it.
- **Unmoderated content evaluative methods:** Methods such as first-impression / first-click testing determine if users can find what they are looking for, are likely to find it, and how easy it is or isn't that records where they click on wireframes, prototypes, and/or screenshots.
- **Long-term behavior and experience studies (e.g., diary study):** Unmoderated, long-term studies in which people are given a means to record (diary or camera) and describe aspects of their lives that are relevant to a site, product or service.
- **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 can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.
- **User research studies (e.g., user interviews; usability tests):** User research, such as user interviews and usability tests are conversations around a series of topics, potentially including probing questions and follow-up questions. This may include listening sessions or similar semi-structured discussions during which information is requested. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, user research studies are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. User research studies are useful because they allow for an interactive approach to information gathering, while maintaining some

consistency across respondents. User research studies typically involve direct observation.

- **Program assessment questionnaire:** These questionnaires may be used to solicit feedback from other persons who use Federal government programs or IT systems, such as Federal contractors or employees of state and local governments.

Overall, this research will be designed to fulfill the following goals: (1) discover barriers to access that create inequities for users of government systems and services; (2) inform the development of USDS and agency research, (3) discover early warnings of issues with service delivery; and (4) 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 Federal agencies and the public. It will also allow feedback to contribute directly to the improvement of program management.

USDS will only submit a collection for approval under this renewed generic clearance if it meets the following conditions:

- 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;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained beyond applicable Federal record retention schedules, if any;
- 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 Item 16 (below) will be followed);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;² and
- 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.

If these conditions are not met, USDS will instead 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 collection request will be submitted to OMB on a standardized form, along with supporting documentation (e.g., a copy of the instrument). USDS understands that OMB

² 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.”

will make every effort to review materials for individual generic information collection requests *within 10 working days* of submission.

USDS will designate an official to manage this generic clearance and they will conduct an independent review of each proposed information collection to ensure compliance with the terms of this clearance prior to its submission to OMB.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

There are neither legal nor technical obstacles to the use of technology in these information collection activities. The determination to use technology, and which technology to use, will be based on the type of information collected and the utility and the availability of specific technology to each respondent in a proposed customer research activity or feedback survey.

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.

USDS will work to ensure the streamlining of all research under this clearance. The information to be supplied on these surveys will not be duplicated on any other information collection.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

The information collected will represent the minimum burden necessary by sampling as appropriate, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Describe the consequences 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.

If this information is not collected, vital feedback from the public on the Federal government's programs and services will be unavailable. This information is necessary to

provide Federal Agencies with adequate information to adjust their services to meet the public's 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 than 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 that 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.**

These collections will be consistent with all the guidelines in 5 CFR 1320. There are no such special circumstances that would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should USDS need to deviate from the requirements outlined in 5 CFR 1320, individual justification will be provided to OMB on a case-by-case basis.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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 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 instruction and record keeping, 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 3 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.

The 60-day public comment notice was published in the Federal Register on December 1, 2021, pages 68287-68289. Zero comments were received.

The 30-day public comment notice was published in the Federal Register on April 5, 2022, pages 19713-19715.

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

In general, USDS will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Remote and in-person usability sessions or interviews are the exceptions.

In the case of remote and in-person user research interviews or usability sessions, USDS may provide appropriate user research incentives based on agency and industry standards.

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

In general, the individual collections under this generic would not require retrieving information by name or other personal identifier – thereby not triggering the need for Systems of Records Notice (SORN). The privacy impact assessment (PIA) for this system is currently being created and will be posted at on OMB’s website.

With each individual collection submitted under this generic, USDS will provide the exact language of any statement(s) that will be read or provided to respondents explaining how their information will be handled and protected by USDS and any contractors. The following information will be provided with each collection.

- a. If the Agency is pledging to keep the information “confidential,” then the citation for the statute used as the basis of the confidentiality pledge will be provided including the appropriate excerpt from the statute or as a supplementary document.
- b. Each collection will also provide an explanation for any pledge of confidentiality that is not supported by authority established in statute or regulation or that is not supported by disclosure and data security policies that are consistent with the pledge.
- c. If respondents are required to submit proprietary trade secrets, or other confidential information the agency will explain the procedures being implemented to protect the information’s confidentiality to the extent permitted by law.
- d. If the Agency collects any personally identifiable information -- meaning information that can be used to distinguish or trace an individual’s identity, either alone or when combined with other personal information that can be linked to a specific individual, the following questions will be answered.

- i. Is any of the information collected included in records that are subject to the Privacy Act of 1974 (5 U.S.C. § 552a)?
 1. If yes, does the agency include a Privacy Act *statement* on the form (or on a separate form that can be retained by the individual) that clearly informs the individual regarding:
 - i. the agency’s authority for the collection,
 - ii. whether providing the information is voluntary or mandatory,
 - iii. the principal purpose(s) for which the information will be used,
 - iv. the *routine uses* which may be made of the information (see 552a(a)(7)), and
 - v. any effects on the individual of not providing certain information.
- ii. If yes, has the agency published a system of records notice (“SORN”) in the Federal Register (see 552a(e))?
 1. If so, provide the Federal Register citation to the *system of records notice*: _____.
 2. If not, explain the status of the agency’s system of records notice and indicate when the agency expects to submit the notice to OMB for review under OMB Circular A-130. (As a reminder, the agency cannot launch a system that is subject to the Privacy Act until the agency has published its notice.)
- iii. If the Agency is using information technology to collect, maintain, or disseminate information that is subject to the E-Government Act of 2002 (44 U.S.C. 3501 note) has the Agency completed a privacy impact assessment in full compliance with 44 U.S.C. 3501 note § 208.
 1. If so, provide a link to the privacy impact assessment that is posted on the Agency’s website, or explain why the Agency has determined that making the privacy impact assessment publicly available is not practicable (see 208(b)(1)(B)(iii)).
- e. Drawing on the relevant SORN and/or privacy impact assessment, briefly describe how the Agency has considered and addressed privacy issues pertaining to the collection. For example, explain how the Agency is collecting only the minimum personally identifiable information that is necessary to accomplish a purpose required by statute, regulation, or executive order.

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. The 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.

Demographic questions may be asked in support of programmatic objectives and user research participants. In order to engage directly with applicants, beneficiaries, and other members of the public who use or need to use the specific government systems and

services USDS is helping to improve, the agency needs to ask demographic questions. Demographic information, such as age range, location (zip code), benefit interaction and/or eligibility status, education level, employment status, housing status, etc. for example, ensures USDS is able to focus research on relevant members of the public.

USDS avoids statistical sampling and will not use the feedback from any single individual to inform major policy decisions. USDS is committed to diversity, inclusion, equity, and accessibility. It is integral to USDS that all feedback incorporated into our recommendations reflects this commitment.

If such questions are deemed necessary, they will be highlighted in the submission to OMB for approval. No other 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 by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. 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 in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)**
- **Provide estimates of annualized cost to respondents of 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 in Item 14.**

USDS estimates that the total burden of this information collection over a three-year period will be 20,676 hours. USDS estimates that the annual burden of this information collection is as follows, with one response per respondent:

Estimated Annual Burden

Type of Collection	Number of Respondents	Minutes Per Response	Total Hours
Pre-study self-identification questionnaire	10,000	5	833
Unmoderated comment cards/complaint forms	2,500	5	208
Unmoderated qualitative user experience questionnaire	2,500	30	1,250
Unmoderated information architecture evaluative methods	800	60	800
Unmoderated content evaluative methods	800	60	800
Long-term behavior and experience studies	50	300	250
Focus groups	100	60	100
User research studies	2,500	60	2,500
Program assessment questionnaires	300	30	150
Total	19,550	610	6,892

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- 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. 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 acquiring and maintaining 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 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. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

No costs for respondents 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

USDS may incur costs in setting up focus group, small discussion, or testing environments to include such things as hiring contractors, facilitators or moderators, travel to customer sample locations, renting meeting space, in providing remuneration, etc. Costs will be determined on an individual project basis and will be provided in each individual collection under this generic clearance.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

N/A – this is a request for a new collection

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 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.

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.

USDS will include the OMB Control Number and collection expiration date at any qualitative feedback or testing activity and on each survey.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

USDS is not requesting an exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions" of OMB Form 83-I.