

Supporting Statement A

Generic Clearance for the Collection of Qualitative

Feedback on Agency Service Delivery (NIAID)

OMB Number: 0925-0668, Expiration Date: 4/30/2022

This is an extension to the original submission and all changes throughout this document are in yellow highlight

Date

4/21/2022

Check off which applies:

- New
- Revision
- Reinstatement with Change
- Reinstatement without Change
- **Extension**
- Emergency
- Existing

Name: Brandie Taylor Bumgardner

Address: 5601 Fishers Lane, Rockville, Maryland 20892

Telephone: 240.669.2096

Fax: FAX 301-480-5752

Email: Brandie.TaylorBumgardner@niaid.nih.gov

National Institute of Allergy and Infectious Diseases

National Institutes of Health

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A. Justification

Abstract: This collection of information is necessary to enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

A.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, the National Institute of Allergy and Infectious Diseases of the National Institutes of Health (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 garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our customers and stakeholders will help ensure that users have an effective, efficient, and satisfying experience with the Agency's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, provide an early warning of issues with service, or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections will allow for ongoing, collaborative and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

A.2 Purpose and Use of the Information Collection

Improving agency programs requires ongoing assessment of service delivery, by which we mean systematic review of the operation of a program compared to a set of explicit or implicit standards, as a means of contributing to the continuous improvement of the program. The Agency will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The solicitation of feedback will target areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Responses will be assessed to plan and inform efforts to improve or maintain the quality of service offered to the public. If this information is not collected, vital feedback from customers and stakeholders on the Agency's services will be unavailable.

The Agency will 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, the Agency will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the focus group guide). 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)
- In-person observation testing (e.g., website or software usability tests)

There have been 21 projects approved under this generic clearance since its approval three years ago, all contributing significantly to the mission of NIAID. The projects have ranged from customer satisfaction surveys to focus groups. Attachment 2 provides a list of the information collections (sub-studies) that have been previously approved in the past three years.

The Agency has established a manager/managing entity 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.

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.”

A.3 Use of Information Technology and Burden Reduction

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

A.4 Efforts to Identify Duplication and Use of Similar Information

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

A.5 Impact on Small Businesses or Other Small Entities

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

A.6 Consequences of Collecting the Information Less Frequently

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

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

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

A.8.1 Comments in Response to the Federal Register Notice

In accordance with 5 CFR 1320.8(d), on February 10, 2022, a 60-day notice for public comment was published in the *Federal Register* 87 pgs., 7848-7849 (87 FR 7848). No public comments were received.

A.8.2 Efforts to Consult Outside Agency

In addition to public comments, NIAID solicits input from stakeholders through feedback mechanisms such as those already approved by OMB, reports, annual meetings and other venues.

A.9 Explanation of Any Payment of Gift to Respondents

The “default” for much of this work will be not to offer incentives. However, when deemed necessary, for instance, when individuals are recruited to travel to interviewing site, respondents may be eligible for an incentive. Some participants will receive a standard nominal incentive, number of follow-up visits required, etc. The decision to provide incentive and amount provided is in keeping with standard federal and institutional guidance. Incentive levels will vary between \$15-75 USD per interaction, dependent upon the duration of the interaction (survey vs. IDI vs. home visits), target audience, geographic location, and number of visits. Inadequate respondent recruitment limits the effectiveness of the

questionnaire evaluation. Requests and justification for incentives will be included in each individual collection submission.

A.10 Assurance of Confidentiality Provided to Respondents

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. Personally Identifiable Information (PII) will not be collected.

A.11 Justification for Sensitive Questions

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

A.12.1 Estimates of Hour Burden Including Annualized Hourly Costs

A variety of instrument’s and platforms will be used to collect information from respondents. The annual burden hours requested (2,511) are based on the number of collections we expect to conduct over the requested period for this clearance. **The estimated burden is over the three years is 7533.**

Table 12-1 Estimated Annualized Burden Hours

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Customer satisfaction surveys	4000	1	30/60	2000
In-Depth Interviews (IDIs) or Small Discussion Groups	50	1	90/60	75
Individual Brief Interviews	50	1	15/60	13
Focus Groups	30	1	2	60
Pilot testing surveys	25	1	30/60	13
Conferences and Training Pre- and Post-surveys	500	1	30/60	250
Website or Software Usability Tests	50	1	2	100
Total	4705	4705		2511

A.12-2 ANNUAL COST TO RESPONDENT

No costs are anticipated except for the respondents' time to participate in these activities are anticipated. Estimates are based on both the historical numbers of respondents from past projects as well as projections of projects to be conducted over the next three years. The total cost burden over 3 years is estimated to be **\$257,733.27**. NIAID estimates the burden of this collection of information as follows:

Table 12-2 Annualized Cost to Respondents

	Total Annual Burden	Hourly Respondent Wage Rate*	Respondent Cost
Customer satisfaction surveys	2000	\$27.07	\$27,070
		\$41.30	\$41,300
In-Depth Interviews (IDIs) or Small Discussion Groups	75	\$27.07	\$812.10
		\$41.30	\$1,858.50
Individual Brief Interviews	13	\$27.07	\$169.19
		\$41.30	\$258.13
Focus Groups	60	\$27.07	\$812.10
		\$41.30	\$1,239
Pilot testing surveys	13	\$27.72	\$169.19
		\$41.30	\$258.13
Conferences and Training Pre- and Post-surveys	250	\$27.07	\$3,383.75
		\$41.30	\$5,162.50
Website or Software Usability Tests	100	\$27.07	\$1,353.50
		\$41.30	\$2,065
TOTAL			\$85,911.09

*Bureau of Labor Statistics: The General Public rate was obtained from the https://www.bls.gov/oes/2020/May/oes_nat.htm#00-0000

The Health Professionals wage rate was obtained from https://www.bls.gov/oes/2020/May/oes_nat.htm#29-0000 Occupation title "Healthcare Practitioners and Technical Occupations", occupation code 29-0000.

A.13 Estimate of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no other costs, including capital and start-up, or operation, maintenance, and purchase costs, associated with this generic.

A.14 Annualized Cost to the Federal Government

The anticipated cost to the Federal Government is approximately \$340,000 annually, for a total of approximately 1 million over the period of three years. These costs are comprised of: operational expenses (e.g., equipment, overhead, printing, postage and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance.

Cost Descriptions	Grade/Step	Salary	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
NIAID PRA/OMB Liaison	15-7	\$172,500	5%		\$8,625
Assistant NIAID PRA/OMB Liaison	14-4	\$134,782	30%		\$40,434.60
Contractor Staff (Project Director, Senior Researcher, Analyst, project support)		\$685,237	40%		\$274,094.80
Operational Costs for Data Collection Activities (e.g., printing, postage, equipment), non-labor					\$12,000
Contractor Cost					
Travel					
Other Cost					
Total					\$335,154

*the Salary in table above is cited from <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/18Tables/html/DCB.aspx>

A.15 Explanation for Program Changes or Adjustments

This is a request for an extension without change for 0925-0668 - Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (NIAID). There are no changes to the purpose/scope of this submission from the previously approved submission. During the last 3 years, NIAID utilized 5174 burden hours. NIAID has increased awareness of the customer service generic through presentations at multiple Institute-wide forums and utilization of the *InsideNIAID* electronic newsletter. Based on the interest generated and anticipated requests we expect using closer to 7533 burden hours at the end of the 3 years

A.16 Plans for Tabulation and Publication and Project Time Schedule

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, 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.

A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

We are requesting no exemption.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

None