SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION Generic Clearance for the Collection of Qualitative Feedback on CEQ Stakeholder Engagement

OMB Control Number: _____, CEQ ICR Number: _____

PART A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Order 14058 of December 13, 2021 (Transforming Federal Customer Experience and Service Delivery To Rebuild Trust in Government) directs the Federal Government to improve its service delivery and customer experience. It builds on the goals set in Executive Order 12862 of September 11, 1993 (Setting Customer Service Standards), Executive Order 13571 of April 27, 2011 (Streamlining Service Delivery and Improving Customer Service), Executive Order 13707 of September 15, 2015 (Using Behavioral Science Insights To Better Serve the American People), and Executive Order 13985 of January 20, 2021(Advancing Racial Equity and Support for Underserved Communities through the Federal Government). In order to work continuously to ensure that CEQ's programs are effective and meet stakeholders' needs, CEQ seeks OMB's 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 CEQ to garner stakeholder feedback in an efficient, timely manner in accordance with CEQ's commitment to improving service delivery. The information collected from CEQ stakeholders will help ensure that they have an effective, efficient, and satisfying experience with CEQ's programs and initiatives. This feedback will provide insights into stakeholder perceptions, experiences, and expectations, provide an understanding 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 CEQ and its stakeholders. It also will allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection

CEQ seeks stakeholder input and feedback in order to improve its programs and service delivery. CEQ will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current services and make improvements in programs and 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 provided by CEQ. If this information is not collected, vital feedback from stakeholders on CEQ's services will be unavailable.

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

- Information gathered will be used only for general service improvement and program management purposes;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions;
- Information gathered will yield qualitative information, meaning that 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 information 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 renumeration for participants of focus groups, personally identifiable information is collected only to the extent necessary and is not retained.

If these conditions are not met, CEQ will submit an information collection request (ICR) 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, CEQ will submit a standardized request form to OMB along with copies or screen-shots of any collection instruments. According to OMB procedures for generic ICRs, the submission will have automatic approval unless OMB identifies issues within 5 business days.

The types of collections that this generic clearance covers include the following.

• <u>Customer satisfaction surveys</u> (e.g., post-transaction surveys; opt-out web surveys; website satisfaction surveys) – Customer satisfaction surveys are tools used to change or improve programs, products, or services. 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. For example, Executive Order 14008 of January 27, 2021 (Tackling the Climate Crisis at Home and Abroad) directed CEQ to play a key role in coordinating environmental justice

efforts across the whole-of-government. CEQ now oversees the Climate and Economic Justice Screening Tool, a web-based mapping tool intended to help agencies identify disadvantaged communities under the Justice40 Initiative. Customer satisfaction surveys will be an effective way to ensure that the tool meets the needs of the public, Federal agencies, and key stakeholders, and that the website is improved accordingly. Additionally, Executive Order 14008 requires agencies to submit and update a draft action plan to the National Climate Task Force and the Federal Chief Sustainability Officer. CEQ might conduct a survey to identify the types of technical support that agencies need for updating their climate vulnerability assessments or their climate literacy training.

- <u>Methodological testing or other pre-testing</u> CEQ may use methodological testing or other pre-testing to validate tests in order to sharpen the options for survey planning or to run feasibility tests to determine if additional future data collection is useful or not. This type of testing greatly facilitates iterative rounds of testing. For example, CEQ could conduct pre-testing on new and existing surveys, as well as other methodological research, to gain insight into aspects pertaining to data quality and ease-of-use for synthesis or analysis.
- <u>Message development and testing</u> CEQ may conduct iterative rounds of A/B testing, 1:1 interviews, or focus groups to help develop messaging for media, campaigns, guidance development, or rulemaking related to its programs. Message development and testing would help ensure that the information is clear, interesting, and useful for different target audiences.
- <u>In-person or remote observation testing</u> (e.g., website or software usability tests) Observational testing of a website, software, or application can provide valuable insight into the user's experience of attempting to accomplish a task. It can be done in-person or remotely through an online session. Users may perform a task and then explain what they find or have trouble finding, what was confusing, what could be improved, or what worked well. This visual gives the developers an opportunity to see the application through the eyes of the users. Observational testing enables users to drive the development of a system so that it will be easier for people to use. During these types of sessions, participants additionally can provide, through generative research techniques, ideas for new features and functions and help prioritize future development efforts.
- <u>Conferences, Workshops, Webinars</u> CEQ may conduct customer satisfaction surveys to obtain feedback on whether a session met the participant's desired outcomes. The responses to these surveys will be analyzed so that future conferences, workshops, and webinars may be improved upon to better meet the needs of participants.
- <u>Websites, Publications, Data Systems</u> Customer satisfaction surveys or quality control surveys designed to enhance product improvement of websites, publications and data systems developed by or for CEQ (but which may be hosted by a different agency on behalf of CEQ) provide valuable qualitative feedback of these services. This qualitative feedback helps CEQ to better understand how the services are being received and how to improve the products and services offered. The insight gained from these survey responses will enable CEQ to ensure the accuracy and quality of its

websites, publications, and data systems, and also ensure that they are easier for the public to use and navigate.

- <u>Community/Industry Outreach and Education Programs</u> CEQ serves the public by engaging with different community groups, industries, governments, and other stakeholders. Collecting information from key stakeholders about CEQ's programs is critical to ensuring good customer service.
- <u>Focus Groups</u> CEQ engages with the public through in-person and virtual interactions. Gathering stakeholder feedback through focus groups and small discussion groups allows participants to personally interact with CEQ staff. This personal interaction ensures that CEQ can take in comments from the community, whether or not they are online.
- <u>Prizes/Contests</u> CEQ may wish to sponsor a series of prizes or competitions, specifically to seek input, and spur innovation, in the areas of environmental, climate, and socioeconomic data collection and validation as such data is an important part of the overall functionality of the Climate and Economic Justice Screening Tool. These competitions would encourage input from the public and encourage broad social participation by collecting ideas to help improve the program.

CEQ's Office of the General Counsel 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

Wherever possible, CEQ will collect information electronically or use online collaboration tools to reduce burden.

4. Duplication of Information

CEQ does not gather or maintain similar data and does not know of other sources for this information.

5. Reducing the Burden on Small Entities

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

6. Consequences of Not Conducting Collection

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

7. Special Circumstances

There are no special circumstances. The information collection is voluntary and will not be used for statistical analysis.

8. Consultations with Persons Outside CEQ

In accordance with 5 CFR 1320.8(d), on March 16, 2022, CEQ published a 60-day notice for public comment in the *Federal Register* (87 FR 14842). CEQ received no comments in response to the 60-day notice.

9. Payment or Gift

CEQ will not provide payment or other forms of remuneration to respondents on its various forms of collecting feedback.

10. Confidentiality

It is unlikely that collections under this generic ICR will require confidential information from respondents. CEQ will collect such information only when necessary and only in instances where a pledge of confidentiality is supported by authority established in statute or regulation, supported by disclosure and data security policies that are consistent with the pledge, and in a manner that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If CEQ 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 and platforms will be used to collect information from respondents. The annual burden hours requested are based on the number of collections CEQ expects to conduct over the requested period for this clearance.

Estimated Reporting Burden Over Three Years				
Type of Collection	No. of	Frequency of	Hours per	Total
	Respondents	Response	Response	Hours
Qualitative Survey	125,000	1	0.072	9,000

13. Costs to Respondents

CEQ does not anticipate any costs.

14. Costs to Federal Government

CEQ 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, 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. Reason for Change

The total burden hours have been adjusted upward to reflect the accurate three-year total of the burden hours. Due to a clerical error, the 60-day notice only listed the burden hours for 1 year (3,000 total hours), instead of 3 years (9,000 total hours) for 125,000 respondents. This results in a burden of less than 5 minutes per person (0.072 hours per person), which is a very minimal burden to the public.

16. Tabulation of Results, Schedule, Analysis Plans

Feedback collected under this generic clearance provides useful information, but it does not yield analytic results that can be generalized to the overall population. They will not be characterized as such. If findings are shared with the public, they will be released only in an aggregated or anonymized manner.

17. Display of OMB Approval Date

CEQ does not request an exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.