

**Office of the Comptroller of the Currency**  
**Supporting Statement**  
**Generic Clearance for the Collection of**  
**Qualitative Feedback on Agency Service Delivery**  
**OMB Control No. 1557-0248**

**A. Justification.**

**1. *Circumstances that make the collection 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 users' needs, the Office of the Comptroller of the Currency (OCC) seeks renewal of an OMB generic clearance to collect qualitative feedback on its service delivery. Qualitative feedback is information that provides insights on perceptions and opinions but does not include statistical surveys or quantitative results that can be generalized to the surveyed population.

This collection of information is necessary to enable the OCC to solicit user feedback in an efficient and timely manner in accordance with its commitment to improving delivery of services. The information collected from users helps ensure that users have an effective, efficient, and satisfying experience with the OCC's programs. This feedback offers insights into user perceptions, experiences, and expectations and can provide an early warning of issues with service and/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 communications between the OCC and users, and the resulting feedback contributes directly to improving program management.

**2. *Use of the Information:***

Improving OCC programs requires the ongoing assessment of service delivery. This means performing a systematic review of the operation of a program against a set of explicit or implicit standards as a means of contributing to the continuous improvement of the program. The OCC will analyze and interpret information collected through this generic clearance to identify the strengths and weaknesses of current services and make improvements in service delivery based on the feedback received. The OCC will solicit feedback that targets areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Information provided by respondents will be used to plan and inform efforts to improve or maintain the quality of service offered to the public. If the OCC does not collect this information, vital feedback from users on the OCC's services will not be available.

The OCC will only submit a specific information collection for approval under this generic clearance if the collection meets the following conditions:

- It is voluntary;

- It imposes a low burden on respondents (based on consideration of total burden hours, total number of respondents, or burden-hours per respondent) and a low cost on both respondents and the Federal government;
- It is non-controversial and does not raise issues of concern to other Federal agencies;
- It is targeted to solicit opinions from respondents who have experience with the program or will have experience with the program in the near future;
- It includes personally identifiable information (PII) only to the extent necessary, and the OCC does not retain the PII;<sup>1</sup>
- It gathers information intended to be used internally only for general service improvement and program management purposes and not intended for release outside of the OCC;
- It does not gather information to be used for the purpose of substantially informing influential policy decisions;
- It gathers information that will yield qualitative information and will not be designed or expected to yield statistically reliable results or used to reach general conclusions about the surveyed population; and
- Feedback collected provides useful information but does not yield data that can be attributed to the overall population.

The OCC will not use this type of generic clearance for the collection of qualitative feedback for any quantitative information collection.

If these conditions are not met, the OCC will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a specific collection that meets the conditions of this generic clearance, the OCC will submit a standardized form to OMB along with supporting documentation, including a copy of the instrument. The submission will be automatically approved, unless OMB identifies issues within five business days.

The types of collections covered by this generic clearance include, but are not limited to:

- User comment cards/complaint forms;
- Small discussion groups;
- Focus groups of users;
- Cognitive laboratory studies, such as those used to refine questions or assess a website's usability;
- Qualitative satisfaction surveys (*e.g.*, post-transaction surveys; opt-out web surveys); and
- In-person observation testing (*e.g.*, website or software usability tests).

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<sup>1</sup> The OCC may retain PII only in limited circumstances, and if it does so, the OCC must comply with applicable requirements, restrictions, and prohibitions of the Privacy Act of 1974 and other privacy and confidentiality laws that govern the collection, retention, use, and/or disclosure of such PII.

**3. Consideration of the use of improved information technology:**

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

**4. Efforts to identify duplication:**

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

**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 OCC will minimize the burden imposed on them by information collections approved under this clearance through sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

**6. Consequences to the Federal program if the collection were conducted less frequently:**

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

**7. Special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320:**

Not applicable.

**8. Efforts to consult with persons outside the agency:**

The OCC issued a notice for 60 days of comment regarding the collection on July 12, 2022, 87 FR 41384. No comments were received.

**9. Payment or gift to respondents:**

Not applicable.

**10. Any assurance of confidentiality:**

The information will be kept confidential to the extent permitted by law.

**11. Justification for questions of a sensitive nature:**

The OCC may retain personally identifiable information (PII) only in limited circumstances, and if it does so, the OCC must comply with applicable requirements,

restrictions, and prohibitions of the Privacy Act of 1974 and other privacy and confidentiality laws that govern the collection, retention, use, and/or disclosure of such PII.

**12. Burden estimates:**

A variety of instruments and platforms will be used to collect information from respondents.

| <b>Estimated Annual Reporting Burden</b> |                           |                                      |                           |                    |
|--|---------------------------|--------------------------------------|---------------------------|--------------------|
| <b>Type of Collection</b>                | <b>No. of Respondents</b> | <b>Annual Frequency per Response</b> | <b>Hours per Response</b> | <b>Total Hours</b> |
| Feedback on OCC Issuances and Seminars   | 6,000                     | 2                                    | .25                       | 3000               |
| Focus Groups                             | 25                        | 1                                    | 4                         | 100                |
| Usability Testing                        | 3,000                     | 1                                    | .25                       | 750                |
| <b>Total Burden</b>                      |                           |                                      |                           | <b>3,850</b>       |

Cost of Hour Burden: 3,850 x \$119.63 = \$460,575.50

To estimate wages the OCC reviewed May 2021 data for wages (by industry and occupation) from the U.S. Bureau of Labor Statistics (BLS) for credit intermediation and related activities (NAICS 5220A1). To estimate compensation costs associated with the rule, the OCC uses \$119.63 per hour, which is based on the average of the 90th percentile for six occupations adjusted for inflation (6.1 percent as of Q1 2022), plus an additional 32.8 percent for benefits (based on the percent of total compensation allocated to benefits as of Q4 2021 for NAICS 522: credit intermediation and related activities).

**13. Estimate of total annual costs to respondents (excluding cost of hour burden in Item #12):**

No costs are anticipated.

**14. Estimate of annualized costs to Federal government:**

None.

**15. Change in burden:**

Former Burden: 2,850 hours.  
Current Burden: 3,850

Difference: + 1,000

The change in burden is due to the increase in the number of feedback instruments.

**16. Information regarding collections whose results are to be published for statistical use:**

Not applicable.

**17. Reasons for not displaying OMB approval expiration date:**

Not applicable.

**18. Exceptions to certification statement:**

Not applicable.