

August 11, 2023

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 – NW131

**Title: Generic Clearance for the Multi-Modal Mixed Methods
Collection of Information to Inform Agency Marketing and Outreach**

Form Number(s): None

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.

Executive Order 12862, *Setting Customer Service Standards* (58 FR 48257), directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. Section 1(b) of Executive Order 12862 requires Government Agencies to “survey customers to determine the kind and quality of services they want.”

On March 30, 2016, President Obama established the Core Federal Services Council, which again emphasized the need to deliver world-class customer service to the American people. The Council, composed of the major high-volume, high-impact Federal programs that provide transactional services directly to the public, were encouraged “to improve the customer experience by using public and private sector management best practices, such as conducting self-assessments and journey mapping, collecting transactional feedback data, and sharing such data with frontline and other staff.”

In March 2018, the Administration of President Trump launched the President's Management Agenda (PMA) and established new Cross-Agency Priority (CAP) Goals. Excellent service was established as a core component of the mission, service, stewardship model that frames the entire PMA, embedding a customer-focused approach in all of the PMA's initiatives. This model was also included in the 2018 update of the

Federal Performance Framework in Circular A-11, ensuring “excellent service” as a focus in future agency strategic planning efforts. The PMA included a CAP Goal on Improving Customer Experience with Federal Services, with a primary strategy to drive improvements within 25 of the nation's highest impact programs, which includes the Federal Emergency Management Agency (FEMA). This effort is supported by an interagency team and guidance in Circular A-11 requiring the collection of customer feedback data and increasing the use of industry best practices to conduct customer research.

These Presidential actions and requirements establish an ongoing process of collecting customer insights and using them to improve services.

In addition, the Foundations for Evidence-Based Policymaking Act of 2018 (“Evidence Act”)(115 Pub. L. 435) enables agencies to collect and analyze data to use as evidence in policymaking, as well as assess the effectiveness and efficiency of current programs.

To work continuously to ensure that our programs are effective and meet our customers’ needs, FEMA seeks to obtain the Office of Management and Budget’s (OMB) approval of a generic clearance to collect information through mixed methods (quantitative and qualitative) to improve marketing, outreach, and other promotional activities of services, programs, and opportunities offered by FEMA. By quantitative and qualitative feedback, we mean information that provides useful insights on perceptions and opinions to yield results that can be generalized to the population of this study. A critical first component of understanding customer experience is to develop customer personas and journey maps. This process enables FEMA to more deeply understand the customer segments they serve and to organize the processes customers interact with throughout their engagement with FEMA to accomplish a task or meet a need. In order to adequately capture the perspective of the customer and the barriers or supports that exist as they navigate these journeys, it is necessary to directly interact with customers. This can occur through a variety of information collection mechanisms that include focus groups, individual intercept interviews at a service site, shadowing a user as they navigate a Federal service and documenting their reactions and frustrations, customer free-response comment cards, or informal small discussion groups.

If this information is not collected, vital feedback from customers and stakeholders on FEMA’s programs and services will be unavailable and FEMA would not be compliant with the Evidence Act, as described in OMB’s memorandum M-19-23, dated July 10, 2019, laying out the initial implementation of the Evidence Act.

This collection of information is necessary to enable FEMA to gather feedback from the general public and stakeholders (including intermediaries such as insurance agents and

other types of industry stakeholders) in an efficient, timely manner, in accordance with our commitment to improving marketing and outreach activities. The information collected from the general public and stakeholders will help further understand the key decision-making factors of the general public and stakeholders with FEMA's programs. This feedback will provide insights into potential customer and/or stakeholder perceptions, experiences and expectations, and focus attention on actions that can improve the marketing and outreach of FEMA's services and programs. These collections will allow for tailored communications and real-time measurement of the marketing activities between FEMA and its current and future customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management, as well as improve the customer of experience of the users receiving the service.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

In accordance with the Evidence Act, the collected information will equip FEMA with vital feedback from the general public and stakeholders that will allow for evidence-based improvements to FEMA's programs and services. Improving agency programs requires ongoing assessment of the customer base, by which we mean systematic review of the current size and composition of FEMA's stakeholders (including customers, agents, and other stakeholders) and the stakeholders' experience with FEMA's programs, as a means of contributing to the continuous improvement of FEMA's marketing outreach.

FEMA will collect, analyze, and interpret information gathered through investigations approved under this generic clearance to identify strengths and weaknesses of programs based on current stakeholder experience and make improvements in the marketing and other promotional activities based on feedback. The solicitation of feedback will target areas such as: various marketing messages or themes; attitudes, perceptions, motivations, and behaviors of individual consumers, agents, and/or stakeholders regarding floods, flood risk, flood insurance program, products, and processes. Responses will be assessed to plan and inform efforts to improve or maintain the quality of the marketing outreach and messaging to the public.

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

- Information gathered will yield qualitative and/or quantitative information; some of the collections will be designed or expected to yield statistically reliable results or used as though the results are generalizable to the target population of study; not all information gathered is expected to be generalizable;
- 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 may or may not have experience with the program or who may or may not 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 interviews, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, FEMA 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, a standardized form will be submitted to OMB along with supporting documentation (e.g., data collection instrument). 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:

- Focus Groups of customers, the general public, agents, or other stakeholders;
- Key Informant Interviews with industry experts, government officials, or other subject matter experts;
- Cognitive Interviews, such as those used to refine questions or assess usability of a resource (e.g., website);
- Surveys of customers, the general public, agents, or other stakeholders;
- User Experience (UI/UX) Testing or other digital observation testing (e.g., website or other web resources); and
- A/B Message Testing or split message testing (e.g., digital and print messaging).

FEMA 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.

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.

If appropriate, FEMA will collect information electronically and/or use online collaboration tools to reduce burden. The data collection will be gathered electronically when possible in order to reduce burden on participants and allow them to join from the comfort of their own homes or wherever they choose to participate. Electronic data collection also reduces government costs to support travel to collect insights. In-person information collection will be used minimally and only when it will provide valuable insights that cannot be similarly obtained through electronic means.

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.

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source. No similar data is gathered or maintained by FEMA, other government agencies with similar clearances, or are available from other sources known to FEMA.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize.

Small businesses or other small entities may be involved in these efforts but FEMA will minimize the burden of information collections approved under this clearance by sampling (i.e., such that we are selecting a subset of the population of interest versus a census), asking for readily available information, and using short, easy-to-complete information collection instruments. Thus, this information collection should not impose a significant economic impact on a substantial number of small businesses or entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information 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 information from the general public and stakeholders on FEMA's programs and services will be unavailable and not compliant

with the Evidence Act. Without these types of information, FEMA will not have timely information to adjust its marketing, outreach, and other promotional activities to meet customer needs.

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

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(a) Requiring respondents to report information to the agency more often than quarterly.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(c) Requiring respondents to submit more than an original and two copies of any document.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(e) 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.

This special circumstance does not apply to this data collection. Statistical survey data will be designed and collected in a way that will produce valid and reliable results that

can be generalized to the population universe under study. We will use best practices in study design, sampling, stratification, weighting, analyses and dissemination to support the generalizability of the results.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

(g) 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.

This special circumstance does not apply to this data collection. FEMA intends to keep participant information confidential because we aim to collect and save a minimal amount of personally identifiable information and only what is necessary for administrative and logistical purposes.

(h) Requiring respondents to submit proprietary trade secret, 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.

This information collection is conducted in a manner consistent with the guidelines in 5 CFR 1320.5(d)(2).

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

A 60-day Federal Register Notice inviting public comments was published on May 5, 2023, at 88 FR 29143. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on August 11, 2023, at 88 FR 54634. The public comment period is open until September 11, 2023.

b. 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.

N/A.

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

N/A.

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

FEMA will not directly provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. For focus groups, cognitive interviews, and UI/UX testing, we may work with a third-party vendor to provide stipends to compensate participants for their time.

In the case of cognitive interviews and UI/UX testing, participants may receive a stipend of up to \$50. In the case of focus groups, participants may receive a stipend of up to \$150. These amounts are based on industry standards and feedback from various market research firms. FEMA will provide OMB with additional justifications in the request for clearance of these specific activities.

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

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.

All data collections (qualitative and quantitative) will include informed consent language that will notify participants of data handling and confidentiality procedures. For example, no PII will be collected outside of necessary use for scheduling qualitative sessions. In these instances, PII will be used by the recruiting team and will not be shared with the research team, such that PII cannot be tied to any data. For any video sessions that are facilitated and/or recorded, all names will be changed to first name only prior to beginning the recording to ensure full names are not recorded or stored. All recordings will be deleted immediately upon study completion.

11. Provide additional justification for any question 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.

There will be no questions of sensitive nature collected as part of any of these activities.

12. Provide estimates of the hour burden of the collection of information. The statement should:

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). 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 desired. 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.

FEMA estimates that information will be collected from 30,300 individuals and households. The average burden per response is 0.15 hours (9 minutes). Based on this, FEMA estimates total annual burden hours of 4,545 ($= 30,300 \times 0.15$).

FEMA estimates that information will be collected from 15,300 insurance agents. The average burden per response is 0.2167 hours (13 minutes). Based on this, FEMA estimates total annual burden hours of 3,316 ($= 15,300 \times 0.2167$).

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

The individual generic instruments will be added to the collection after it is approved by OMB.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.45 and this total should be entered in the cell for “Avg. Hourly Wage Rate”. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

A variety of instruments and platforms will be used to collect information from respondents. Based on the number of collections FEMA expects to conduct over the requested period for this clearance and past generic clearance submissions, FEMA estimates annual burden hours of 7,861 ($= 4,545 + 3,316$).

Estimated Annualized Burden Hours and Costs								
Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Total No. of Responses	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
Individuals and Households	Survey and/or Focus Group	30,300	1	30,300	0.15	4,545	\$43.15	\$196,117
Private Sector	Survey and/or Focus Group	15,300	1	15,300	0.2167	3,316	\$53.65	\$177,903
Total		45,600		45,600		7,861		\$374,020

Instruction for Wage-rate category multiplier: Take each non-loaded “Avg. Hourly Wage Rate” from the BLS website table and multiply that number by 1.45.¹ For example, a non-loaded BLS table wage rate of \$42.51 would be multiplied by 1.45, and the entry for the “Avg. Hourly Wage Rate” would be \$61.64.

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for All Occupations (00-0000), individuals and households, is \$29.76.² Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$43.15 ($= \29.76×1.45) per hour. Therefore, the burden hour cost is estimated to be \$196,117 annually ($\$43.15 \times 4,545 \text{ hours} = \$196,117$).

According to the U.S. Department of Labor, Bureau of Labor Statistics, the May 2022 Occupational Employment and Wage Estimates wage rate for Insurance Sales Agents (41-3021) is \$37.00. Including the wage rate multiplier of 1.45, the fully-loaded wage rate is \$53.65 ($= \37.00×1.45) per hour. Therefore, the burden hour cost is estimated to be \$177,903 annually ($\$53.65 \times 3,316 \text{ hours} = \$177,903$).

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

¹ Bureau of Labor Statistics, Employer Costs for Employee Compensation, Table 1. Available at https://www.bls.gov/news.release/archives/ecec_03172023.pdf. Accessed March 20, 2023. The wage multiplier is calculated by dividing total compensation for all workers of \$42.48 by wages and salaries for all workers of \$29.32 per hour yielding a benefits multiplier of approximately 1.45.

² Information on the mean wage rate from the U.S. Department of Labor, Bureau of Labor Statistics is available online at: https://www.bls.gov/oes/2022/may/oes_nat.htm. Accessed July 10, 2023.

The cost estimates should be split into two components:

- a. **Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing 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.**

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

- b. **Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.**

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

The anticipated cost to the Federal Government is approximately \$748,830 annually. These costs are comprised of contract costs, staff salaries, and computer hardware and software.

Annual Cost to the Federal Government	
Item	Cost (\$)
Contract Costs [Funding for contract costs related to data collection and analysis, including focus group incentives which will be distributed by contract team]: \$731,837	\$731,837
Staff Salaries ¹ : 1 GS 15 Step 5 at 5% time × 1.45 ² loaded wage rate [$\$176,458 \times 0.05 \times 1.45 = \$12,793$]	\$12,793
Facilities [cost for renting, overhead, etc. for data collection activity]	\$0
Computer Hardware and Software [cost of equipment annual lifecycle]	\$4,200
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	\$0
Travel (not to exceed)	\$0
Focus Group Incentive [included in contract costs]	\$0
Postage & Printing	\$0
Total	\$748,830
¹ Office of Personnel Management 2023 Pay and Leave Tables for the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf . Accessed April 14, 2023	
² Wage rate includes a 1.45 multiplier to reflect the fully-loaded wage rate.	

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

A “**Program increase**” is an additional burden resulting from a Federal Government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A “**Program decrease**”, is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal Agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

An “**Adjustment**” denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data Collection Activity/Instrument	Program Change (hours currently on OMB inventory)	Program Change (new)	Difference	Adjustment (hours currently on OMB inventory)	Adjustment (new)	Difference
Survey and/or Focus Group	0	4,545	4,545			
Survey and/or Focus Group	0	3,316	3,316			
Total	0	7,861	7,861			

Explain: This is a new collection. New Burden hours total to 7,861 hours annually.

Itemized Changes in Annual Cost Burden						
Data Collection Activity/Instrument	Program Change (cost currently on OMB inventory)	Program Change (new)	Difference	Adjustment (cost currently on OMB inventory)	Adjustment (new)	Difference
Survey and/or Focus Group	\$0	\$196,117	\$196,117			
Survey and/or Focus Group	\$0	\$177,903	\$177,903			
Total	\$0	\$374,020	\$374,020			

Explain: This is a new collection. New cost totals to \$374,020 annually.

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.

FEMA intends to use the information collected for internal purposes, as well as to improve industry engagement with the program by sharing the insights collected. Appropriate analysis will be used for all information collected. FEMA may also receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). FEMA will disseminate the findings when appropriate, strictly following the “Guidelines for Ensuring the Quality of Information Disseminated to the Public” and will include specific discussion of the limitation of any results.³

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain reasons that display would be inappropriate.

³ Guidelines for Ensuring the Quality of Information Disseminated to the Public. Content last reviewed September 2019. Agency for Healthcare Research and Quality, Rockville, MD. <https://www.ahrq.gov/research/publications/ahrq-info-quality-gdlns.html>

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instruments.

18. Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

FEMA does not request an exception to the certification of this information collection.