

# **Request for Fast-Track Generic Clearance for the Collection of Routine Customer Feedback on HHS Communications**

## **Supporting Statement for 0990-0459**

### **JUSTIFICATION**

#### **1. Circumstances Making the Collection of Information Necessary**

The U.S. Department of Health and Human Services (HHS), Office of the Secretary, Office of the Assistant Secretary for Public Affairs (ASPA), conducts national public affairs programs and provides centralized leadership and guidance for public affairs activities within HHS' 17 Staff Divisions, 11 Operating Divisions, and 10 Regional Offices (hereafter 'HHS Offices'). ASPA is seeking OMB renewal of this Fast-Track generic clearance that allows HHS Offices to collect qualitative feedback on HHS communication products (e.g. brochures, booklets, posters, toolkits, fact sheets, videos, public service announcements, websites, campaign materials, etc).

This collection of information is necessary to enable HHS to garner customer and stakeholder feedback. Information will be collected from our customers and stakeholders from the concept phase to the end of the product life cycle. This will help ensure that users have an effective, efficient, and satisfying experience with HHS communications products. The primary objectives are to help HHS improve communications products that: 1) meet the needs of the audience; 2) use effective mediums for delivering messages to audiences; 3) motivate the expected impact or change; 4) require mid-course corrections; and 5) require change in development and dissemination strategies for future communications.

In order to ensure that HHS communication products are effective and have the highest potential to be received, understood, and accepted by those for whom they are intended, HHS Offices will conduct surveys to collect feedback from their target audiences. Feedback will be collected at the concept phase, in advance of product development to help determine product need, as well as throughout the development process – message testing, product prototype testing, testing after dissemination. ASPA is requesting a renewal of this Fast-Track generic clearance for collecting qualitative feedback to help ensure the content will be appropriate at meeting audience needs.

This feedback will provide insights into audience perceptions, experiences and expectations, provide an early indication of issues with content, and focus attention on areas where changes might improve understanding and impact. If this information is not collected, vital feedback on HHS communications will be unavailable, preventing programs from developing communications products that meets the needs of the audience and demonstrating impact of the communications products developed.

#### **2. Purpose and Use of the Information**

HHS Offices plan to use the data collected under this generic clearance to inform the development of HHS communication products and identify areas for improvement in content or delivery. If needed, revisions would be intended to increase the success rate of communication products, increasing the return on investment. It will also allow feedback to contribute directly to the improvement of program management.

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;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions <sup>1</sup>;
- 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 token of appreciations 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 comment card). 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)

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.

### **3. Use of Information Technology and Burden Reduction**

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<sup>1</sup> 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.”

All communications products will be required to undergo review using ASPA’s Strategic Communications Planning tool. Part of this rigorous process is to ensure that evaluation measurements are clearly identified and directly tied to measuring the performance of the communications products. This includes the goals for the communications, how attainment of the goals will be measured, and the plan for evaluation. Where possible, data will be collected from the target audience electronically to reduce the burden to the respondent.

#### **4. Duplication of Information**

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

#### **5. Reducing the Burden on Small Entities**

There is no burden on small businesses or small entities.

#### **6. Consequence of Collecting the Information Less Frequently**

This generic clearance will be available to all HHS Offices (HHS' 17 Staff Divisions, 11 Operating Divisions, and 10 Regional Offices). It is possible that a single communication product may be surveyed several times. For example, feedback may be collected at the concept phase, in advance of product development to help determine product need, as well as throughout the development process – message testing, product prototype testing, and testing after dissemination. The number of times a single communication product may be surveyed will vary based on type of product and production schedule.

#### **7. Special Circumstances**

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

#### **8. Consultations with Persons Outside the Agency**

In accordance with 5 CFR 1320.8(d), on April 20, 2020, a 60-day notice for public comment was published in the *Federal Register*. The Agency received 0 comments in response to the 60-day notice published in Federal Register Volume 85, Number 76; Monday, April 20, 2020; Page 21864.

#### **9. Payment or Gift**

It is standard practice in commercial market research to offer recruited respondents some form of remuneration for the time they spend engaged in a research activity. Instances for offering a small incentive will be determined on a case-by-case basis (depending on the particular information collection design). Small amounts of money may be offered as an incentive for self-administered surveys. Incentive amounts for information collections submitted under this generic will typically not exceed \$40 for 60 minute in-person surveys involving populations that are difficult to recruit online. For any collections involving provision of incentives to participants, the GenIC will provide additional justifications in the request for clearance of these specific activities.

#### **10. Confidentiality**

All participants will be informed at the beginning of the survey that their responses will be treated in a secure manner, that all data will be safeguarded closely, and that no individual identifiers are planned to be used in survey reports.

If Personally identifiable information (PII) is collected in a survey, the Agency will consult appropriate HHS Privacy Officials to confirm that applicable privacy and security laws are satisfied (e.g, Privacy Act) and include a justification for the need and use of the PII in the submission package. If necessary, the GenIC will include the appropriate System of Records Notice and Privacy Impact Assessment in the submission package to OMB.

**11. Sensitive Nature** - No questions will be asked that are of a personal or sensitive nature.

**12. Estimated Burden of Information Collection**

A variety of collection types will be used to gather information from respondents that include, but are not limited to the following:

- 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 communication;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; web surveys)
- In-person observation testing (e.g., campaign usability tests)
- Telephone interviews
- Social media or web-based polls (e.g. Foresee, SurveyMonkey, Facebook polls, etc.)

Survey Type	Number of Respondents	Total Frequency per Response	Hours per Response	Total Hours
Customer Feedback/Satisfaction Survey	50,000	1	30/60	25,000

**13. Cost Burden to Respondents**

No costs are anticipated

**14. Annualized Cost to the Federal Government**

The estimated anticipated cost to the Federal Government is approximately \$383,400 annually. These costs are comprised of: instrument preparation, implementation and analysis; survey preparation, conduction and analysis; and manager survey review.

Surveys will be prepared/conducted by contractors or Federal staff (FTE). An FTE manager will review all surveys. Project teams will vary across HHS but typically an FTE and contractor will work together on survey preparations, coding the surveys electronically, conducting the surveys, and analyzing of data. Additionally, a senior-level FTE will typically review and approve the activities. The amount of time Federal staff and contractors spend on surveys will vary

depending on the number of participants for each survey, the number of questions, and the site being surveyed. An average number of 200 communication products will be surveyed a year are assumed for estimation purposes (assuming up to 3 surveys per communication product) equals an estimated total of 600 surveys per year. Overall time spent by Agency staff and contractors is lessened as this package provides tasks and questions to be used in the survey; thus, reducing time staff normally would have spent developing these questions.

Staff or Contractor	Average Hours per Study	Average Hourly Rate	Average Cost
Contractor instrument preparation, conduction, analysis (GS-13 equivalent)	3	\$49.00	\$147.00
FTE survey preparation, conduction, analysis (GS-13)	10	\$49.00	\$490.00
FTE manager survey review (GS-14)	1	\$58.00	\$58.00
AVERAGE COST PER SURVEY			\$695.00
AVERAGE 1-YEAR COST			\$417,000

**15. Explanation for Program Changes or Adjustments**

This is a request to renew the Generic for the collection of information. Also, an adjustment to the number of respondents from 1,000,000 to 50,000 decreased by -950,000. Adjustment to burden hrs. 500,000 to 25,000 decreased by -475,000 burden hrs.

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

We are not requesting an exemption to this requirement. The OMB expiration date will be displayed.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

These information collection activities involve no exception to the Certification for Paperwork Reduction Act Submissions.