



**U.S. Merit Systems Protection Board**  
Supporting Statement A for Paperwork Reduction Act Submissions

**OMB Control Number: 3124-0015**

**Title: Reinstatement of a Previously Approved Information Collection for Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery**

The U.S. Merit Systems Protection Board (MSPB) is seeking to reinstate a previously approved information collection in accordance with the Paperwork Reduction Act (PRA). The Information Collection Request (ICR) will be submitted to the Office of Management and Budget (OMB) for review and clearance. This information collection is part of MSPB's efforts to improve customer service delivery. The information collection instruments consist of short customer focused surveys distributed through Qualtrics, MSPB's survey platform. Through this collection and approval process, MSPB is complying with normal clearance procedures and meeting our commitments under Executive Order 12862, "Setting Customer Service Standards" (September 11, 1993).

**JUSTIFICATION**

**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, MSPB seeks a reinstatement and three-year renewal of its previously approved ICR. 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 MSPB to obtain 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 MSPB'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 MSPB and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

**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



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implicit standards, as a means of contributing to the continuous improvement of the program. MSPB 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 MSPB's services will not be available.

MSPB will only submit a collection for approval under this generic clearance if it meets the following conditions:<sup>1</sup>

- 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.<sup>2</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;
- The collections are targeted to solicit the opinions of respondents who have already experienced, or may experience in the future, an MSPB program; and,
- Personally identifiable information (PII) is collected only to the extent necessary, such as when needed to provide remuneration for participants of focus groups and cognitive laboratory studies and is not retained.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with any supporting documentation (e.g., a copy of the comment card). The submission will have automatic approval, unless OMB identifies issues within 5 business days.

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<sup>1</sup> If these conditions are not met, MSPB will submit an information collection request to OMB for approval through the normal PRA process.

<sup>2</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."



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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 or opt-out web surveys).
- In-person observation testing (e.g., website or software usability tests).

MSPB 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 Automated Collection Procedures**

The collection of information from our customers uses automated, electronic, mechanical, or other technological collection techniques or other forms of information technology to the maximum extent possible. In addition, we make every effort to reach our customers using information technology that would reduce the burden on them and ensure the validity of the information we are trying to obtain. On occasion, we may use paper surveys where electronic means are not available or practical.

**4. Duplication of Information**

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

**5. Impact on Small Businesses**

The information we plan to collect does not impact small businesses or other small entities.

**6. Consequences of Not Conducting Collection**

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

**7. Special Circumstances**

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



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

A 60-day Federal Register Notice inviting public comments was published on March 28, 2023, at 88 FR 18348. No comments were received.

A 30-day Federal Register Notice inviting public comments was published on June 8, 2023, at 88 FR 37583.

No consultation was conducted with persons outside the agency.

**9. Payment or Gifts to Respondents**

No payments or gifts of any kind have been provided to any individuals who are connected to this collection.

**10. Assurance of Confidentiality**

MSPB does not anticipate needing to include a pledge of confidentiality. However, if such a pledge is needed, a citation for the statute or regulation authorizing the pledge will be included.

**11. Justification for Any Questions of a Sensitive Nature**

There will be no questions of a sensitive nature on the surveys.

**12. Estimates of Annualized Costs for Collection of Information**

We anticipate that a total of up to 3,000 customer satisfaction surveys will be distributed annually during each year of the three-year period covered by this request. For purposes of calculating the burden on respondents we are assuming that 600 people will respond to our surveys. Our surveys generally take about two (2) to eight (8) minutes to complete, with an average completion time of five (5) minutes. Multiplying 5 minutes (.083) by 600 respondents yields a total maximum burden on respondents of 49.8 hours.

According to the U.S. Department of Labor, Bureau of Labor Statistics website ([www.bls.gov](http://www.bls.gov)) the wage rate category for All Occupations is estimated to be \$37.90 per hour including the 1.4 wage rate multiplier. If respondents chose to participate in our survey, it is anticipated that the average time to complete and return our survey will be about five (5) minutes therefore, the estimated burden hour cost to respondents is \$1,887.42.

**13. Total Cost to Respondents or Record Keepers**

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.



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**14. Estimates of Annualized Costs to the Federal Government**

There are costs to the Federal Government associated with conducting the surveys. These include:

<b>Annual Cost to the Federal Government</b>	
Item	Cost (\$)
Contract Costs	\$ -
Staff Salaries* [One GS 14, step 5 employee spending approximately 4% of their time and one GS 15, step 5 spending approximately 2% of their time annually: $\$4,712 + \$8,012 = \$12,724$ ]	\$12,724
Facilities [cost for renting, overhead, etc., for data collection activity]	0
Computer Hardware and Software [cost of equipment annual lifecycle] (Qualtrics license)	12,100
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	0
Travel	0
<b>Total</b>	<b>\$24,824</b>

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

Not applicable. This renewal reflects no change to the previously approved information collection.

**16. For Collection of Information Whose Results Will be Published, Outline Plans for Tabulation and Publication**

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 MSPB does not intend to publish its findings, we may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). MSPB will disseminate the findings when appropriate.

**17. Approval to Not Display the Expiration Date for OMB Approval of the Information Collection**

This collection does not seek approval to not display the expiration date for OMB approval.

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

This collection does not seek exception to “Certification for Paperwork Reduction Act Submissions”.