

## SUPPORTING STATEMENT A

### National Transportation Safety Board (NTSB)

#### Generic Clearance for the Collection of Qualitative Feedback on NTSB Service Delivery

**1. Circumstances that make 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. To ensure that our programs are effective and meet our customers' needs, the NTSB seeks OMB approval of a generic clearance to collect qualitative feedback on our service delivery. Qualitative feedback means 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 a study.

This collection of information is necessary to enable the NTSB to garner 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 the NTSB's programs. This feedback will provide insights into customer or stakeholder perceptions, experiences, and expectations; provide 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 communication between the NTSB and its customers and stakeholders. This information collection will also allow feedback to contribute directly to the improvement of program management.

**2. How, by whom, how frequently, and for what purpose the information will be**

**used.** 1

Improving NTSB programs requires ongoing assessment of service delivery—systematic review of the operation of a program compared to a set of explicit or implicit standards—as a means of contributing to the continuous improvement of those programs. The NTSB 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 that 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 were not collected, vital feedback from customers and stakeholders on the NTSB's services would be unavailable and the NTSB would not know if adjustments would be warranted.

The NTSB 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 NTSB (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>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 a study;
- The collection is voluntary;
- The collection is low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and is low-cost for both the respondents and the Federal Government;
- The collection is non-controversial and does not raise issues of concern to other Federal agencies;
- The 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 remuneration 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 NTSB 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.
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys).
- In-person observation testing (e.g., website or software usability tests).
- 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.

The NTSB 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.

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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.”

**3. Use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

If appropriate, agencies 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 NTSB or are available from other sources known to the NTSB.

**5. Small businesses or other small entities.**

Small business or other small entities may be involved in these efforts, but the NTSB will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

**6. Consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Without these types of feedback, the NTSB 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.

**8. Federal Register notice, public comments received, and consultation with persons outside the NTSB.**

On May 3, 2023, the NTSB published a 60-Day Notice in the Federal Register (FR) notice concerning this information collection request (ICR). 88 FR 34548. The NTSB neither consulted with persons outside of the NTSB nor received public comments.

**9. Gifts or payments to respondents.**

The NTSB will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the NTSB may provide stipends of up to \$50. In the case of in-person focus groups, the NTSB may provide stipends of up to \$100. If respondents participate in these kinds of studies remotely, via phone or internet, any proposed stipend needs to be justified to OMB and must be considerably less than that provided to respondents in in-person studies who have to travel to the NTSB or other facility to

participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the NTSB will provide OMB with additional justifications in the request for clearance of these specific activities.

**10. Assurance of confidentiality.**

If a confidentiality pledge is deemed useful and feasible, the NTSB 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 NTSB includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

**11. Additional justification for questions of a sensitive nature.**

No questions will be asked that are of a personal or sensitive nature.

**12. Estimate in hours of the burden of the collection of information.**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (1,250 hours) are based on the number of collections the NTSB expects to conduct over the requested period of this clearance.

Type of Collection	No. of Respondents	Frequency per Response	Time per Response	Total Annual Hours (No. Respondents × Time per Response)
Customer Comment Cards/Complaint Forms	5,000	Annual	5 mins.	416.67 Hours
Customer Satisfaction Surveys	5,000	Annual	5 mins.	416.67 Hours
In-Person Observation Testing	--	--	--	--
Small Group Feedback	5,000	Annual	5 mins.	416.67 Hours
Focus Groups	--	--	--	--
Cognitive Laboratory	--	--	--	--

**13. Estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection.**

Participation in this collection is voluntary, and there are no costs to respondents beyond the time spent participating in the surveys.

**14. Estimates of annualized cost to the Federal government.**

The anticipated cost to the Federal Government is approximately \$259,000 annually. The estimate is based on the agency’s cost to analyze each completed information collection, which are handled by NTSB employees at grades GS-14 or -15 at agency headquarters. The average

hourly rate when rounded up for step 1 of grades 14 and 15 in Washington, D.C. is \$69.02.<sup>2</sup> The agency estimates that it would take agency employees no more than 15 minutes to handle each information collection.

**15. Program changes or adjustments.**

No changes or adjustments will occur to any programs.

**16. Plans for tabulation and publication of responses.**

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 the NTSB does not intend to publish its findings, the NTSB may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The NTSB will disseminate the findings when appropriate, strictly following the NTSB's "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of the qualitative results discussed above.

**17. Display of expiration date.**

The NTSB will display the expiration date of OMB's approval.

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

These activities comply with the requirements in 5 CFR § 1320.9.

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<sup>2</sup> The NTSB's calculation is based on the U.S. Office of Personnel Management's 2023 General Schedule Locality Pay Tables: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB.aspx>.