

SUPPORTING STATEMENT
U.S. Department of Commerce
National Institute of Standards and Technology
Generic Clearance for Usability Data Collections
OMB Control No. 0693-0043

SUPPORTING STATEMENT PART A

Abstract

The National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce (DOC), proposes to conduct a variety of usability data collections under this generic collection.

The data collections will be designed to determine requirements and evaluate the usability and utility of NIST research for measurement and standardization work. These data collections efforts may include, but may not be limited to electronic methodologies, empirical studies, video and audio collections, interviews, and questionnaires. This includes narrative information explaining the purpose, scope, and benefit(s) of this data collection request.

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.

In accordance with the Office of Management and Budget's (OMB) regulations at 5 CFR 1320 implementing the Paperwork Reduction Act (PRA), the Government Performance and Results Modernization Act of 2012, and its mission ...

“To promote U.S. innovation and industrial competitiveness by advancing measurement science, standards, and technology in ways that enhance economic security and improve our quality of life.”

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Examples of previously approved data collections include user perceptions of online privacy and security, user experiences with Smart Home Devices, and IoT usage by public safety-first responders.

NIST will limit its inquiries to data collections that solicit strictly voluntary opinions and information and will not – under this PRA clearance request – collect information that is required (mandatory) or regulated.

For each proposed request using the generic clearance, NIST will submit the actual instrument and any related documents (letters, emails to respondents, scripts, etc.) to OMB along with responses to the following questions:

1. Explain who will be surveyed and why the group is appropriate to survey.
2. Explain how the survey was developed including consultation with interested parties, pre-testing, and responses to suggestions for improvement.
3. Explain how the survey will be conducted, how customers will be sampled if fewer than all customers will be surveyed, expected response rate, and actions your agency plans to take to improve the response rate.
4. Describe how the results of the survey will be analyzed and used to generalize the results to the entire customer population.

The following collections have been previously approved, are ongoing, and are part of this request.

Visual Perception of Color Quality of Light Sources
NIST Luminous Lights - Airport Signaling Data Collection
Forensic DNA Technical Leader Survey (Private Sector)
Forensic DNA Technical Leader Survey (State, Local, or Tribal Governments)
Forensic DNA Technical Leader Survey (Federal Government)
Exploring AI Expert and Non- Expert Perceptions of Artificial Intelligence

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.

Data collected by NIST researchers will be used to help plan the direction of future research. The information collected will not be directly disseminated to the public, but aspects or portions of the information collected may be used to support research published in various journals and conferences. There will be no attribution to individuals in the analyzed data. Since the data collected from this collection may involve Human Subjects, these individual collection efforts will need to be vetted through and approved by the NIST Institutional Review Board (IRB) as needed or required.

This information collection and dissemination will comply with the NIST Chief Information Officer (CIO) Information Quality Guidelines and Standards. Quality will be ensured and established at levels appropriate to the nature and timeliness of the information to be disseminated and will include all pre-dissemination reviews, as required by the Information Quality Guidelines and Standards.

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.

Whenever possible, improved information technology will be used to reduce burden on NIST's customers. In addition to traditional data collection methods, NIST will, whenever possible, offer electronic response options via the NIST Internet website and by fax.

The planned use of transactional and electronic web site surveys will substantially contribute to the number of projected responses and associated burden hours.

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.

NIST has an internal review process that will examine each survey or data collection effort to be conducted under this generic clearance – to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. NIST is confident that the procedures in place ensure that there will be no duplication. Due the nature of NIST's unique mission and programs no similar data exists.

Individuals participating in these types of usability data collection efforts may be asked to sign an informed consent document (meaning participants are informed of the data collection and are providing their consent to participate) and no individual will be surveyed more than once for the same research study.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Some small businesses and other small entities may be involved in these efforts, but NIST will keep the burden to them-as well as on any business, organization, or individual-at a minimum by asking for opinions on a strictly voluntary basis and by asking for only the minimum amount of information needed to evaluate usability and utility of NIST research for measurement and standardization work.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If these surveys and other data collections were conducted less frequently or not conducted, NIST researchers would not have important information that may hinder the future direction and scope of NIST research as well as achieving NIST's mission.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: requiring respondents to report information to the agency more often than quarterly; requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract; grant-in-aid, or tax records, for more than three years; 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; requiring the use of a statistical data classification that has not been reviewed and approved by OMB; 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; or requiring respondents to submit proprietary trade secrets, 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.

The data collections conducted under this generic clearance will be conducted in accordance with the guidelines stated in 5 CFR 1320.05.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day Federal Register Notice soliciting public comment was published on Tuesday, December 7, 2021 (Vol. 86, pg. 69228). No comments were received.

A 30-day Federal Register Notice soliciting public comment was published on Tuesday, March 29, 2022 (Vol. 87, pg. 17991).

NIST will consult with various research groups and stakeholders from whom information is to be obtained or those who must compile records at least once every 3 years.

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

NIST will not provide any payment or gift to respondents to any written, telephone, comment card, or other such information collection. However, if respondents must leave their home or place of business to travel to a specific location, NIST will, on a case-by-case basis, consider a modest remuneration for the participant's travel expenses. In such cases, the remuneration may range from \$50-\$100 per individual, dependent on the data collection and the level and length of participation required of the participants.

Respondents that participate in information collections conducted in a "laboratory" type setting (such as in-depth interviews, and usability testing, etc.) under this clearance may receive a small stipend to offset the cost of travel expenses. This practice has proven effective when recruiting subjects to participate in specific research and is employed by other Federal cognitive laboratories. The average incentive for participation in a one-on-one interview or usability is approximately \$50.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If the collection requires a system of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Individuals will be assured of confidentiality to the extent permitted by law, including the Freedom of Information Act (FOIA).

The Privacy Act (5 U.S.C. § 552a (3)) only requires a Privacy Act Statement when collecting personal information that will be placed or stored in a system of records. Each information collection under this generic clearance will be assessed for Personally Identifiable Information (PII) and how the information is stored and retrieved. If a collection is deemed to be part of a System of Records as defined by the Privacy Act, NIST will describe the appropriate System of Records Notice (SORN) and provide a Privacy Act Statement on the instrument.

11. Provide additional justification for any questions 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.

No sensitive data will be collected.

12. Provide estimates of the hour burden of the collection of information.

The estimated total for the three-year period of approval is 150,000 responses and 100,000 burden hours.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet).

There are no known out-of-pocket costs to the respondents or record keepers that participate in these information collections.

14. Provide estimates of annualized costs 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 not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

This is an umbrella submission. NIST estimates that the Program Analysts responsible for overseeing this generic umbrella and each of the individual information collection requests (ICRs) will devote an estimated one hundred and twenty (120) hours per year on this function. The estimated cost for the oversight is \$13,920, based on a loaded professional salary of \$116 per hour.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

There are no changes to the information collection since the last OMB approval.

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.

The results of the data collections may be used in papers published in research journals and presented at conferences. There will be no attribution to individuals in the analyzed data.

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

All written and electronic material will display the expiration date of the OMB approval of the information collection. All written and electronic surveys (with the exception of transactional surveys in the form of business reply cards where space will not permit) will also display the following notification:

A Federal agency may not conduct or sponsor, and a person is not required to respond to, nor shall a person be subject to a penalty for failure to comply with an information

collection subject to the requirements of the Paperwork Reduction Act of 1995 unless the information collection has a currently valid OMB Control Number. The approved OMB Control Number for this information collection is 0693-0043. Without this approval, we could not conduct this survey/information collection. Public reporting for this information collection is estimated to be approximately ____ minutes/hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection. All responses to this information collection are voluntary/mandatory/required to obtain benefits. Send comments regarding this burden estimate or any other aspect of this information collection, including suggestions for reducing this burden to National Institute of Standards and Technology (NIST) at: address, Attn: Title/POC Name, and email if desired.

18. Explain each exception to the topics of the certification statement identified in “Certification or Paperwork Reduction Act Submissions.”

NIST does not require any exceptions.