Supporting Statement A

Generic Clearance for the Collection of Qualitative

Feedback on Agency Service Delivery (NIH)

OMB Number: 0925-0648, Expiration Date: 06/30/2024

This is an extension to the original submission and all changes throughout this document are in yellow highlight.

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Attachments

1. Fast-Track Template Submission Form

A. JUSTIFICATION

This extension will allow the continuation of qualitative feedback on our service delivery for an additional three (3) years. This information collection activity has garnered qualitative customer and stakeholder feedback efficient, timely manner, to the Administration's commitment to improving service delivery. This generic has provided information about the NIH customer or stakeholder perceptions, experiences, and expectations, provided an early warning of service issues or focused attention on areas where communication, training, or operations changes might improve product or service delivery. Feedback collected under this generic clearance provides helpful information but does not yield data that can be generalized to the overall population.

A.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. To work continuously to ensure that our programs are effective and meet our customers' needs. 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 the National Institutes of Health 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 agency'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 the agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

A.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 implicit standards, as a means of contributing to the continuous improvement of the program. The agency 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 (see Attachment 1). If this information is not collected, vital feedback from customers and stakeholders on the agency's services will be unavailable.

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 DHHS (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 [1];
- 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 soon; and
- Except for information needed to provide renumeration 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 survey). 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)

[1] As defined in OMB and DHHS, "Guidelines for Ensuring the Quality of Information Disseminated to the Public," “influential” means that 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.”

- 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.

There have been 359 projects approved under this generic clearance since its approval three years ago all contributing significantly to the mission of NIH. Two specific forms have been included in the burden table; the NIH-Wide basic registration and abstract form which had already aligned with the scope of the request but warrants its own burden allocation. Several programs have indicated they wish to continue collecting data past the current expiration date as the frequency of reporting on the templates suggest. These projects have ranged from focus groups to pre and post meeting surveys as well as customer satisfaction surveys.

Sub-studies submitted in 2021 where the template did not include the frequency of reporting section, has notified the NIH PRA Office of their plans to continue collecting data as well while the extension is pending.

A.3 Use of Information Technology and Burden Reduction

If appropriate, agency will collect information electronically and/or use online collaboration tools to reduce burden.

A.4 Efforts to Identify Duplication and Use of Similar Information

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

A.5 Impact on Small Businesses or Other Small Entities

Small business or other small entities may be involved in these efforts, but the agency 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.

A.6 Consequences of Not Conducting Collection

Without these types of feedback, the agency will not have timely information to adjust its services to meet customer needs. In addition, this would decrease the chance that federal efforts are spent on approaches that stakeholders are not responsive to or cannot benefit from.

A.7 Special Circumstances Relating to the Guidance of 5 CFR 1320.5

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

A.8.1 Comments in Response to the Federal Register Notice

The 60-day Federal Register notice soliciting comments to Generic was published in Federal Register on April 10th, 2024, page 25275 (89Vol No. 70) and allowed 60 days for public comment. No public comments were received.

A.9 Payment or Gift

The agency 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 agency may provide stipends of up to $40. In the case of in-person focus groups, the agency may provide stipends of up to $75. 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 must travel to the agency or other facility to participate. If such information collections include hard-to-reach groups and the agency plans to offer non-standard stipends, the agency will provide OMB with additional justifications in the request for clearance of these specific activities.

A.10 Confidentiality

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 agency 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.

A.11 Sensitive Nature

No questions will be asked that are of a personal or sensitive nature. Demographic information, including ethnicity, race, and gender, may be asked however, they will relate to the research question of the collection and will be justified on the template of the request.

A.12.1 Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (103,083) are based on the number of collections we expect to conduct over the requested period for this clearance.

Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Customer Satisfaction Surveys	1,000	1	30/60	500
In-Depth Interviews (IDIs) or Small Discussion Groups	1,000	1	90/60	1,500
Focus Groups	1,000	1	90/60	1,500
Usability and Pilot Testing	150,000	1	5/60	12,500
Conference/Training – Pre- and Post-Surveys	100,000	2	10/60	33,333
NIH-Wide Basic Abstract Form	50,000	1	1	50,000
NIH-Wide Basic Registration Form	75,000	1	3/60	3,750
Total	378,000	478,000		103,083

A.12.2 Costs to Respondents

No costs are anticipated.

A.13

There are no capital or start-up costs to the data collection efforts requested; nor are there any costs associated with operation, maintenance or purchase of services.

A.14 Costs to Federal Government

The annual cost to the Federal Government for the proposed data collection effort is $18,121.60

Cost Descriptions	Grade/Step	Salary*	% of Effort	Fringe (if applicable)	Total Cost to Gov't
Federal Oversight					
Program Analyst	GS 14/10	$181,216	10%		$18,121.60
Contractor Cost					
Travel					
Other Cost					
Total					$18,121.60

*Salary in table above is cited from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB.pdf

A.15 Reason for Change

This is an extension of a currently approved submission. There are no substantive changes to the content of the request however, burden hours have increased to accommodate the use of the NIH-Wide basic registration and abstract form which already align with the scope of the request. These two forms allow programs to use at free will so long as the data elements of the forms remain as is.

A.16 Tabulation of Results, Schedule, Analysis Plans

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 agency does not intend to publish its findings, the agency may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The

agency will disseminate the findings when appropriate, strictly following the OMB'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.

A.17 Display of OMB Approval Date

We are requesting no exemption.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.