

SUPPORTING STATEMENT - PART A

Title of information collection: Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery

OMB Control Number: 2700-0153

Type of information collection: Renewal of a Currently Approved Collection

Abstract: No major changes to this renewal collection.

A. 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.

Executive Order 12862 (1993) 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, NASA (hereafter "the Agency") seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery. 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 Agency 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.

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.

Improving NASA 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. NASA 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 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 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. (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.”)
- 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
- 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 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 survey)
- In-person observation testings (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. 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.

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

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.

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

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

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.

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.

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

7. Explain any special circumstances that would cause an information collection to be conducted in an exceptional manner

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

8. Provide the date and page number of publication in the Federal Register for the 60-day and 30-day FNRs, soliciting comments on the information collection prior to submission to OMB.

60-day FRN: 89 FR 20503 on 3/22/2024. No comments were received.

30-day FRN: 89 FR 57172 on 7/12/2024.

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

NASA does not anticipate payment or other forms of remuneration to respondents associated with customer feedback/engagement activities.

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 have to 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.

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 systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

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 agencies 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.

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.

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

12. Provide estimates of the hour 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 are based on the number of collections we expect to conduct over the requested period for this clearance.

	Events	Respondents per event	Responses	Minutes	Burden
Comment Cards	200	25	5,000	5	417 hours
Small Discussion Groups	400	16	2,400	60	2,400 hours
Focus Groups	2,400	12	28,800	90	43,200 hours
Customer Surveys	200,000	50	10,000,000	.6	100,000 hours
TOTAL	203,000	variable	10,036,200	Variable	146,017 hours

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

No costs are anticipated.

14. Provide estimates of annualized costs to the Federal government.

Costs to manage systems for electronic surveys, etc are already covered in existing contract costs. However, minimal additional costs of up to \$15,000 are expected and allowed.

15. Explain the reasons for any major program changes or adjustments to burden hours or annualized costs to respondents.

Not applicable in this renewal.

16. For collections 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 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 Agency'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. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We are not requesting an exemption. The expiration date will be displayed within the required PRA statement.

18. Explain any exception to the below certification statement.

The NASA Sponsor to this information collection must address the certification below and enter their name and position title. The NASA Office of the Chief Information Officer must concur on any exceptions requested by the information collection sponsor, or the package will not be forwarded to OMB.

The proposed collection of information –

- (a) is necessary for the proper performance of the functions of NASA, including that the information to be collected will have practical utility;
- (b) is not unnecessarily duplicative of information that is reasonably accessible to the agency;
- (c) reduces to the extent practicable and appropriate the burden on persons who shall provide information to or for the agency, including with respect to small entities, as defined in the Regulatory Flexibility Act (5 U.S.C. 601(6)), the use of such techniques as:
 - (1) establishing differing compliance or reporting requirements or timelines that take into account the resources available to those who are to respond;

- (2) the clarification, consolidation, or simplification of compliance and reporting requirements; or
- (3) an exemption from coverage of the collection of information, or any part thereof;
- (d) is written using plain, coherent, and unambiguous terminology and is understandable to those who are targeted to respond;
- (e) indicates for each recordkeeping requirement the length of time persons are required to maintain the records specified;
- (f) has been developed by an office that has planned and allocated resources for the efficient and effective management and use of the information to be collected, including the processing of the information in a manner which shall enhance, where appropriate, the utility of the information to agencies and the public;
- (g) when applicable, uses effective and efficient statistical survey methodology appropriate to the purpose for which the information is to be collected; and
- (h) to the maximum extent practicable, uses appropriate information technology to reduce burden and improve data quality, agency efficiency and responsiveness to the public; and
- (i) will display the required PRA statement with the active OMB control number, as validated on www.reginfo.gov

The NASA office conducting or sponsoring this information collection certifies compliance with all provisions listed. These activities comply with the requirements in 5 CFR 1320.9.

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