

**SUPPORTING STATEMENT**  
**U.S. Department of Commerce**  
**National Institute of Standards and Technology**  
**Generic Clearance for Customer Service-Related Data Collections**  
**OMB Control No. 0693-0031**

**SUPPORTING STATEMENT PART A**

**Abstract**

In accordance with Executive Order 12862, the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce, proposes to conduct a number of individual information collections that are both quantitative and qualitative. The information collections will be designed to determine the type and quality of the products, services, and information our key customers want and expect, as well as their satisfaction with and awareness of existing products, services, and information. In addition, NIST proposes other customer service satisfaction data collections that include, but may not be limited to focus groups, reply cards that accompany product distributions, and Web-based surveys and dialog boxes that offer customers the opportunity to express their level of satisfaction with NIST products, services, and information and for ongoing dialogue with NIST. NIST will limit its inquiries to data collections that solicit voluntary options and will not collect information that is required or regulated. No assurances of confidentiality will be given. However, it will be completely optional for survey participants to provide their name or affiliation information if they wish to provide comments for which they elect to receive a response.

**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, the Government Performance and Results Act (GPRA) of 1993, Executive Order 12862 - Setting Customer Service Standards, the National Performance Review, good management practices, 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.”

the National Institute of Standards and Technology (NIST), a non-regulatory agency of the Department of Commerce, proposes to conduct a number of surveys and other customer service-related data collections.

These collections, may be both quantitative and qualitative, and will be designed to determine the kind and the quality of products, services, and information NIST's key customers want and expect; satisfaction with and awareness of existing products, services, and information; and, in limited cases, the economic impact of products, services, or assistance provided by NIST.

In addition, NIST proposes other customer service satisfaction data collections that includes, but may not be limited to focus groups, reply cards that accompany product distributions, and web-based surveys and dialogue boxes. NIST will seek to determine its customers' level of satisfaction with its products, services, and information, and provide an ongoing opportunity for dialogue with NIST. The data collections and opportunity for dialogue present a chance for customers to suggest how products, services, and information may be improved or made more useful. It also provides valuable and strategic input on possible new products, services, or fields of research.

NIST will limit its inquiries to data collections that solicit voluntary opinions and information and will not—under this PRA clearance request—collect information that would be considered required, mandatory, or regulated.

For each proposed request using the generic clearance, NIST will submit the actual instrument and related documents (letters, emails to respondents, scripts, etc.) to OMB along with responses to the following questions which would be considered an abbreviated supporting statement.

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, pretesting, 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.

**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.**

In general, the data collected will be used by NIST to determine where and to what extent products, services, and information are satisfactory and where and to what extent they can be improved, or awareness of their availability can be improved. In addition, NIST may seek information on product, information, and service awareness, as well as limited information on the economic impact of selected programs.

Analysis of customer satisfaction data collections may be used as a catalyst for program planning, program changes or enhancements, as well as in identifying high priority items for improvement.

This information collection and dissemination will comply with the NIST Chief Information Officer (CIO) 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.**

Wherever 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 via the NIST Internet web site and by fax. For some data collections, especially those related to its products, services, and information offered via the Internet, NIST will focus on Internet-based responses.

The planned use of transactional and electronic web site surveys contributes 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 individual survey or data collection request to be conducted under the generic clearance—to prevent internal duplication of effort and to ensure that appropriate data collection instruments are developed. By examining its three-year, NIST-wide requirements and combining those requirements into a generic clearance request, NIST is, to the greatest extent possible, centralizing the administration of its customer data collections. This will provide for a more consistent and comprehensive approach. While there may be other surveys or data collections that become the subject of separate clearance requests, NIST is confident that the procedures in place ensure that there will be no duplication. Due to the nature of NIST's unique mission and programs to further that mission, no similar data exists.

**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 likely be involved in these efforts, but NIST will keep the burden for 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 NIST's customer opinions.

Also, as stated in the answer to Question 3, the use of transactional and electronic web site surveys versus paper questionnaires reduces the average respondent burden.

**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.**

These surveys and other data collections should not be collected less frequently. Responses to the collections will assist NIST to customer satisfaction with the products, services, and information it now provides. NIST may seek customer input on future products, services, and programs, which results from these data collections may lead to further investigations that could result in changes to, or enhancements of, the delivery of products, services, and information, as well as identifying high-priority items for improvement or inclusion in the suite of products, services and programs NIST provides. There is no technical or legal obstacle to reducing this burden.

In addition, the Government Performance and Results Act (GPRA) of 1993, Executive Order 12862 - Setting Customer Service Standards, the National Performance Review, and good management practices set the policy and performance precedents that warrant and encourage such data collections.

**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 collection conducted under this generic clearance will be conducted in accordance with the guidelines in 5 CFR 1320.5.

**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 comments was published in the Federal Register on May 28, 2024 (Vol. 89, Number 103, pages 46068-46069). No comments were received.

A 30-day federal register notice soliciting public comments was published in the Federal Register on August 28, 2024 (Vol. 89, Number 167, page 68863).

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 survey. In the case of focus groups, 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 modest remuneration for the participant's time and travel. In such case, the remuneration will range from \$50-\$100 per individual, dependent on the data collection and the level and length of participation required of the participants.

**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.**

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. If PII is collected in any information collection, a review will be conducted for relevancy of Privacy Act and will be assessed for needs of Privacy Act Statement, SORN, and PIA applicability.

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

**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 total annual burden estimates for this collection will be 120,000 responses and 15,000 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.**

It is difficult to estimate Federal costs in advance. The availability of funds and staff resources will impact NIST's ability to conduct all the proposed activities. Consequently, it is uncertain of the number of activities that will be undertaken. In addition, it is difficult to project the number of responses that will be received for surveys. Most of the surveys will be conducted and analyzed using in-house resources.

NIST estimates that the Program Analyst 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 from these data collection activities are not intended for general publication, but may be disseminated to NIST staff, key policy and management officials, and stakeholders.

**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 (at a minimum) the OMB Control #0693-0031 and current expiration on collection instruments. 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 public burden statement:

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 0693-0031. 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.