Supporting Statement A for Paperwork Reduction Act
Generic Information Collection Submissions for
"Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery"
OMB Control No. 0923-0047
Expiration Date 02/28/2025

National Center for Environmental Health and
Agency for Toxic Substances and Disease Registry (NCEH/ATSDR)

Extension

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- Goal of the study: the goal of this information collection is to enable the Agency to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery.
- Intended use of the resulting data: the primary purpose of these collections will be for internal management purposes. There are no plans to publish or otherwise release this information.
- Methods to be used to collect: data collection methods and procedures will vary and the specifics of these will be provided with each collection request.
- The subpopulation to be studied: internal staff, a limited number of external colleagues, and/or customers who are familiar with the programs and products.
- How data will be analyzed: each program will obtain information from statisticians in the development, design, conduct, and analysis of customer/partner service surveys, when appropriate.

A. JUSTIFICATION

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. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the National Center for Environmental Health and the Agency for Toxic Substances and Disease Registry (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. 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. 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 [1];

[1] 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

- 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; 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 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 surveys)
- 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. To date, this information collection has been used for a total of 50 times since the original approval in 2016. During the last 3-year approval period, seven information collections were submitted and approved.

IC Title	Status	Responses	Hours	Dollars	Document Type	Form No.	Form Name
[ASTDR] Training for Home Visitors Assessing Asthma Triggers	New	100	58	0	Other-WORD		
					Other-WORD		

on important public policies or important private sector decisions."

[ATSDR] Environmental Health and Land Reuse (EHLR) Immersion Training Pilots	New	100	47	0	Form and Instruction	None	EHLR Training Registration-Pilots
					Form and Instruction	None	EHLR Immersion Community Engagement Knowledge Assessment
					Form and Instruction	None	EHLR Immersion Pilot Training Feedback Form
					Other-WORD		
					Other-WORD		
					Other-WORD		
[ATSDR] Environmental Justice Index Workshop Feedback Surveys	New	1320	66	0	Form and Instruction	0923-0047	AttB EJI Breakout Session Survey (online)
					Form and Instruction	0923-0047	AttC EJI Use Case Breakout Session Survey (Word)
					Form and Instruction	0923-0047	AttD EJI Explorer Demo Session Survey (Word)
[ATSDR] Evaluation of CDC Childhood Lead Poisoning Prevention Program (CLPPP) Annual Recipients Meeting	New	1275	213	0	Form and Instruction	n/a	Meeting Attendees Evaluation Form
					Form and Instruction	n/a	Meeting Presenters Evaluation Form
[ATSDR] Heat and Health Tracker Evaluation Survey	New	71	18	0	Form and Instruction	0920	Page 1 Heat and Health Tracker Evaluation Survey
					Other-WORD		
[ATSDR] Quality Improvements to NSMBB's quality assurance systems, processes, infrastructure, and workflow to create efficiencies and enhance service delivery	New	3500	583	0	Form	0923-0047-24FL	Laboratorian who submits PT results to NSMBB
Total Burden Actually Used for Information Collections Under Currently Approved ICR:		6366	985	0			

These survey results helped improve agency's performance greatly. Therefore, we would like to continue the data/information collection for another 3-year period.

3. Use of Improved Information Technology and Burden Reduction

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

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.

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.

6. Consequences of Collecting the Information Less Frequently

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

7. **S**pecial Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request fully complies with the regulation 5 CFR 1320 .5. The information collected will be voluntary and will not be used for statistical purposes.

8. **C**omments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with 5 CFR 1320.8(d), on August 16, 2024, a 60-day notice for public comment was published in the *Federal Register* (Vol. 89, No. 159, pp. 66722-66723). No (zero) non-substantive comments were received.

9. Explanation of Any Payment or Gift to Respondents

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 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. Protection of the Privacy and Confidentiality of Information Provided by Respondents

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. Institutional Review Board (IRB) and Justification for Sensitive Questions

This information collection project has been classified as "Not Research" under program evaluation category (Att. 3). IRB Approval is not required.

No sensitive information will be collected.

12. Estimates of Annualized Burden Hours and Costs

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (7,075) are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Small discussion groups	300	1	90/60	450
Request for customer comment cards/complaint forms/post-conference or training surveys	1,500	1	15/60	375
Focus groups of customers, potential customers, delivery partners, or other stakeholders	2,000	1	2	4,000
Qualitative customer satisfaction surveys or interviews	3,000	1	30/60	1,500
Usability testing/in-person observation testing	1,500	1	30/60	750

Estimated Annual Reporting Burden				
Total Burden Hours				7075

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

No costs are anticipated.

14. Annualized Cost to the Government

The anticipated cost to the Federal Government is approximately $500,000 annually. These costs are comprised of: personnel ($130,000), cooperative agreement or contract ($325,000), travel ($31,000), operational expenses ($14,000) (e.g., equipment, overhead, printing, postage, and support staff), and any other expense that is necessary to collect the information approved under this generic clearance.

15. Explanation for Program Changes or Adjustments

This is an extension request. ATSDR is requesting no changes in the annual time burden of 7,075 hours or in the annual number of respondents of 8,300.

16. Plans for Tabulation and Publication and Project Time Schedule

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. Display of OMB Approval Date

The display of the OMB expiration date is not inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.