SUPPORTING STATEMENT A

FOR PAPERWORK REDUCTION ACT SUBMISSION

Generic Clearance for Improving Customer Experience

(OMB Circular A-11, Section 280 Implementation)

2105-0583

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a hard copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information, or you may provide a valid URL link or paste the applicable section. Specify the review type of the collection (new, revision, extension, reinstatement with change, reinstatement without change). If revised, briefly specify the changes. If a rulemaking is involved, make note of the sections or changed sections, if applicable.
Under the Government Service Delivery Improvement (GSDI) Act[1] and the 21st Century Integrated Digital Experience Act[2], along with OMB guidance, agencies are obligated to continually improve the services they provide the public and to collect qualitative and quantitative data from the public to do so.

The purpose of this request is to facilitate the U.S. Department of Transportation's (hereafter "the Agency's") ability to collect feedback from the public to continue to improve its services, thereby facilitating its compliance with statutory requirements and general principles of good governance.

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.

Under this request, four types of activities may be submitted as Gen ICs for approval:

Screeners: If the Agency plans to distribute a screener to 10 or more members of the public before or during a usability testing session, focus group, interview, discussion group, or any other type of session, then it must submit that screener for PRA approval and may use this collection to do so.

Question scripts for interviews, focus groups, discussion groups, etc.: To adequately capture the perspective of members of the public as they interact with government services, it is necessary to directly interact with these people rather than rely solely upon the Agency's stated policy of how a process should work or employees' interpretation of how services are delivered. This can occur through a variety of information collection mechanisms that include focus groups, interviews, or informal small discussion groups. If the Agency plans to conduct an interview,

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[1] 5 U.S.C. Sections 321-24.

[2] 44 U.S.C. Section 3501 note.

focus group, discussion group, etc. involving 10 or more members of the public, then the Agency must submit those questions for PRA approval and may use this collection to do so. Question scripts for usability testing sessions are exempt from PRA review.

Surveys to obtain feedback immediately following a transaction – limited to 15 questions and 5 minutes of burden maximum: These are surveys that are distributed immediately after a member of the public completes a transaction – for example, after submitting an application, after speaking with a call center representative, after receiving correspondence from the Agency, etc. It is imperative that these surveys be extremely short and in no circumstances longer than 15 questions and 5 minutes of burden maximum. The results of these surveys are to be submitted to OMB, using the instructions set forth in relevant OMB guidance.

Other surveys: These surveys may be longer than the feedback surveys discussed above. If the Agency plans to disseminate these surveys to 10 or more members of the public, the Agency will submit the request for PRA approval and may use this collection to do so.

The Agency will only submit under this generic clearance if it meets the following conditions:

- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours or burden-hours per respondent) and are low-cost for both the respondents and the Federal Government;
- The collections are non-controversial;
- 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;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
- Information gathered is intended to be used for general service improvement and program management purposes
- The agency will follow the procedures specified in any relevant OMB guidance for the required reporting to OMB of data from surveys.
- Outside of the reporting mentioned in the bullet immediately above, if the Agency intends to release journey maps, user personas, reports, or other data-related summaries stemming from this collection, the Agency must include appropriate caveats around those summaries, noting that conclusions should not be generalized beyond the sample, considering the sample size and response rates. The Agency must submit the data summary itself (e.g., the report) and the caveat language mentioned above to OMB before it releases them outside the Agency. OMB will engage in a passback process with the agency.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

There are neither legal nor technical obstacles to the use of technology in these information collection activities. The determination to use technology, and which technology to use, will be based on the type of information collected and the utility and the availability of specific technology to each respondent in a proposed activity.

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.

The Agency will ensure all surveys under this clearance include the minimum number of questions necessary to obtain relevant data about the Agency's services. The information to be supplied on these surveys will not be duplicated on any other information collection.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden. A small entity may be (1) a small business which is deemed to be one that is independently owned and operated and that is not dominant in its field of operation; (2) a small organization that is any not-for-profit enterprise that is independently owned and operated and is not dominant in its field; or (3) a small government jurisdiction, which is a government of a city, county, town, township, school district, or special district with a population of less than 50,000.

The information collected in these surveys will represent the minimum burden necessary to evaluate the public's experience with the Agency's programs and processes. The Agency will minimize the burden on respondents by sampling as appropriate, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Describe the consequences 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 regular mechanisms for collecting and generating customer insights, the Agency is not able to provide the public with the highest level of service. These activities will be coordinated to ensure that most individual respondents will not be asked to respond to more than one survey instrument per transaction or to participate in more than one session.

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 than 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 that 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.**

These surveys will be consistent with all the guidelines in 5 CFR 1320. There are no such special circumstances that would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should the Agency need to deviate from the requirements outlined in 5 CFR 1320, individual justification will be provided to OMB on a case-by-case basis.

8. As applicable, state that the Department has published the 60 and 30 Federal Register notices as 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. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. 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.

The 60-day public comment notice was published in the Federal Register on April 8, 2025. The Agency did not receive comments.

The 30-day public comment notice was published in the Federal Register on June 24, 2025.

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

The standard will be no payment or gift to respondents for participation. If any payments are proposed, the Agency will submit specific justification for each proposed use as part of the completed package submitted to OMB.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. If personally identifiable information (PII) is being collected, a Privacy Act statement should be included on the instrument. Please provide a citation for the Systems of Record Notice and the date a Privacy Impact Assessment was completed as indicated on the IC Data Form. A confidentiality statement with a legal citation that authorizes the pledge of confidentiality should be provided.[3] If the collection is subject to the Privacy Act, the Privacy Act statement is deemed sufficient with respect to confidentiality. If there is no expectation of confidentiality, simply state that the Department makes no pledge about the confidentially of the data.

Activity and survey instructions will provide all necessary assurances of confidentiality to the respondents. Although there is no requirement for such an assurance in statute, the quality of this type of information requires respondent candor and anonymity.

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. The 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.

In general, the Agency's generic clearances under this OMB control number will not contain any questions of a sensitive nature. If the Agency identifies a question of a sensitive nature for a specific clearance, the Agency will discuss this in the clearance request.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents by affected public type (federal government, individuals or households, private sector – businesses or other for-profit, private sector – not-for-profit institutions, farms, state, local or tribal governments), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. All narrative should be included in item 12. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in the ROCIS IC Burden Analysis Table. (The table should at minimum include Respondent**

3

types, IC activity, Respondent and Responses, Hours/Response, and Total Hours)

- **Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (100,800) are based on the number of collections we expect to conduct over the requested period for this clearance, per the table below.

The Agency will keep track of the above activities to accurately update burden calculations year to year.

Type of Information Collection	**Number of Respondents**	**Number of responses per respondent**	**Minutes per response**	**Total Burden hours**
Screeners (e.g., distributed before or during a usability testing session or other kind of session)	1,000	1	3	50
Question script for focus group, interview group, etc. Do not include counts for usability testing sessions, since these are exempt from PRA review.	500	1	90	750
Surveys to obtain feedback immediately following a transaction **– Limited to 15 questions and 5 minutes max**	1,000,000	1	5	83,334
Other surveys	100,000	1	10	16,667
Total	1,101,500	NA	NA	100,800

13. Provide an estimate of 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 shown in Items 12 and 14.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected**

useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices. Also, these estimates should not include the hourly costs (i.e., the monetization of the hours) captured above in Item 12**

No costs for respondents are anticipated.

14. Provide estimates of annualized cost 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The Agency will use existing FTE time to conduct these activities. If the Agency intends to compensate participants for a given Gen IC, it will only do so after review and approval by the agency's legal office and will identify the exact amount of compensation in its clearance request for that Gen IC.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion), type of collection (new, revision, extension, reinstatement with change, reinstatement without change) and include totals for changes in burden hours, responses and costs (if applicable).

There is no change in information being collected or the burden.

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.

No attempt will be made to generalize the findings from these activities to be nationally representative or statistically valid. They are meant to compliment and help to contextualize performance and evaluation data.

Insights gleaned from qualitative customer research may be presented publicly in the format of a conceptual user persona or customer journey map. Publicly available journey maps will include specific language to contextualize their use and will be included in specific requests.

Data from feedback surveys will be submitted to OMB for review and publication in the manner set forth in relevant OMB guidance.

This data will include:

- Specific transaction point at which the survey was administered
- Total volume of customers that interacted at this transaction point during the given quarter
- Total volume of customers that were presented the survey
- Total number of customers who completed the survey
- Mode(s) of collection (ex. online, over mobile, over the phone, paper form)
- Specific survey instrument that shows the Agency's wording of questions and instructions

The purpose of collecting volume and response numbers is to share customer feedback measures in context of the response rate and total volume of responses to qualify interpretation of the feedback 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.

The Agency will include the OMB Control Number and collection expiration date on all instruments and within all scripts.

18. Explain each exception to the certification statement identified in the Certification of Paperwork Reduction Act.

The Agency is not requesting an exception to the certification statement identified in Item 20, "Certification for Paperwork Reduction Act Submissions, " of OMB Form 83-I.