

Supporting Statement A

Generic Clearance for the Collection of Feedback on Agency Service Delivery

A. JUSTIFICATION

- 1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.**

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. Executive Order 14058 directs Federal agencies to take action on improving customer experience. In order to work continuously to ensure that programs are effective and meet our customers' needs, the U.S. Office of Personnel Management (OPM) seeks to obtain OMB approval, under the Paperwork Reduction Act of 1995 (PRA), of a generic clearance to collect customer and stakeholder feedback on OPM's programs, policies, and services. Feedback will provide information on perceptions and opinions but will not collect information that will 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 the commitment to improving service delivery. This feedback will provide insights into customer and/or stakeholder experiences, expectations, and perceptions of interactions with OPM services. The feedback will also serve to highlight areas that may require immediate changes. These collections will streamline OPM's customer experience improvement efforts by allowing for ongoing, actionable communication between OPM and its customers.

- 2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.**

Improving agency programs requires ongoing assessment of service delivery, including 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. OPM 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 customer and stakeholder feedback.

Types of collections included in this generic clearance include, but are not limited to,

- Program/event/training surveys;
- Focus groups or interviews with customers, potential customers, or OPM partners;
- Call center surveys;
- Post-transaction satisfaction surveys;
- Collection of test and pilot data; and
- Web-based opt-in and opt-out pop-up surveys.

These data collection efforts will solicit feedback on a variety of focus areas for OPM's programs, policies, and customer services, including topics such as, accuracy, ease of access/use of a particular service mechanism, understanding and success of utilizing a tool or service provided by OPM, effectiveness, efficiency of services accessed, and whether or not a service met expectations. Responses will be analyzed to inform quality improvements or to maintain high-quality, effective services. OPM will only submit a collection for approval under this generic clearance if it meets the following conditions:

- The collections are voluntary;
- The collections are low-burden (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;
- Personally identifiable information (PII) is collected only to the extent necessary and is not retained;
- The collections are noncontroversial;
- Information gathered will not be used for the purpose of substantially informing influential policy decisions; and
- The collections will not be designed or expected to yield results that are generalizable to the population of study.

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.

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.

OPM plans to collect information electronically and/or use online collaboration tools to the greatest extent possible to reduce burden. The determination of which technology to utilize will be based on the utility and availability of specific technology to each respondent in a proposed collection, such as usage of the telephone for post-call surveys or for a customer interview. In all other cases, OPM anticipates that most respondents will provide feedback electronically.

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 information to be supplied on these collections will not be duplicated on any other information collection. As these surveys are mostly collected to gauge reaction or

feelings in response to real-time events, there are no records – federal or otherwise – that OPM may be able to leverage in these cases.

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

The information collected will represent the minimum burden necessary to evaluate customer experience with OPM's programs, policies, and services. OPM 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.

If this information is not collected, timely, vital feedback will continue to be very difficult to obtain and will impact the success of OPM's ongoing improvements. These collections will enable OPM to adapt services more quickly based on feedback so OPM can provide the highest level of service possible. These activities will be coordinated to ensure that most individual respondents will not be asked to respond to more than one information collection per interaction.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; 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 and require the use of a statistical data classification that has not been reviewed and approved by OMB.

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

8. Consultations with Persons Outside the Agency

In accordance with 5 CFR § 1320.8(d), on December 17, 2024, a 60-day notice for public comment was published in the *Federal Register* (See 89 FR 102171). One comment was received for this information collection but as it dealt with foreign missions, it is out of scope of this collection. Accordingly, no changes have been made to the Generic Clearance based upon this comment.

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

OPM does not intend to provide payment or other forms of remuneration to respondents of its various forms of collecting feedback.

10. Describe any assurance of privacy, to the extent permitted by law, provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

If a confidentiality pledge is deemed useful and feasible, OPM will include a pledge of confidentiality that is supported by authority established in statute or regulation, and that is supported by disclosure and data security policies that are consistent with the pledge. Information collection instructions will provide all necessary assurances of confidentiality to the respondents.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private; include 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

OPM's generic clearances under this OMB control number will not contain any questions of a sensitive nature. If OPM identifies a question of a sensitive nature for a specific clearance, it will be included in the clearance request.

12. Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents.

Total Annual Number of Responses: 283,250

Total Annual Time Burden: 13,508

The annual burden hours requested (13,508) are an estimate based on collections similar to those that might be included under this generic clearance in the future. This burden estimate accounts for collections that may be added at a later time.

Estimated Annual Reporting Burden				
Type of Collection	Number of Respondents	Number of Responses/ Respondent	Participation Time	Response Burden (in hours)
Program/event satisfaction surveys	25,500	1	2 minutes per response	850

Estimated Annual Reporting Burden				
Focus groups	100	1	60 minutes	100
Call center surveys	143,000	1	3 minutes per response	7,150
Post-transaction satisfaction surveys	33,084	1	2 minutes per response	1,103
Web-based opt-in and opt-out pop-up surveys	73,536	1	2 minutes per response	2,451
Interviews	30	1	45 minutes	23
Test and pilot data	8,000	1	10 minutes per response	1,333
Total	283,250			13,010

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

No costs are anticipated. There are no capital, start-up, operation, or maintenance costs. Cost estimates are not expected to vary widely. There is no anticipated recordkeeping burden beyond that which is considered usual and customary. The only cost is that for the time of the respondent which would be **\$309,638**, if one takes the overall hourly burden of 13,010 and multiplies it by the national hourly media wage of \$23.80, [as estimated from the Bureau of Labor and Statistics](#).

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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 anticipated cost to the Federal Government is approximately \$27,643.52 annually. These costs consist of staff time related to production and dissemination of the survey materials and analysis of responses for both surveys, interviews, and focus groups (\$20,436.58 annually), as well as for costs related to survey software.

	Annual Cost – Average FTE GS 13, Step 3 DC Area
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	125,827 (hourly \$60.29)			
Type of Collection	Number of Collections	Time per collection (includes development, administration, and analysis)	Total Time	Cost: Total hours x hourly pay (1.59 benefits multiplier)
Program/Event/Training Surveys	3	5	15 hours	1,437.97
Focus Groups	7	3	21 hours	2,031.08
Call Center Surveys	1	7	7 hours	671.03
Post-transaction satisfaction surveys	3	5	15 hours	1,437.97
Web-based opt-in and opt-out pop-up surveys	3	5	15 hours	1,437.97
Interviews	30	30	90 hours	8,627.50
Test and pilot data	10	5	50 hours	4,793.06
Total				\$20,436.58

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.

Not applicable, this is a new collection.

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.

Feedback collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the population of study. Instead, feedback and findings are meant to complement and help contextualize performance and evaluation data to better understand Federal service implementation and opportunity for improvement. The agency may publish findings only in aggregate, as appropriate under Federal privacy and confidentiality laws to publicly discuss customer service improvements based on the results.

Customer satisfaction surveys employ statistical methods according to OMB guidance and analysis methodologies vary by survey. Details on methodology, including statistical limitations, will be published with any aggregate data.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No exception needed.

18. Explain each exception to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” of OMB 83-I.

These activities comply with the requirements in 5 CFR § 1320.9. No exception needed.