Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery

OMB Information Collection Request
0970 - 0401

Supporting Statement Part A - Justification

April 2024

Type of Request: **Revision**

Submitted By:
Administration for Children and Families
U.S. Department of Health and Human Services

Summary

This request is for a revision. There are no changes to the proposed types or the uses of the information collected through Generic Information Collections (GenICs) submitted under the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (0970-0401). Burden estimates have been updated to reflect the Administration for Children and Families' (ACF's) use of this generic mechanism since the most recent approval in 2021 and anticipated use over the next three years.

1. Circumstances Making the Collection of Information Necessary

Executive Order (EO) 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. In 2011, EO 13571 on "Streamlining Service Delivery and Improving Customer Service". Subsequently, the Office of Management and Budget Office of Information and Regulatory Affairs issued Memorandum M-11-26[1] describing the establishment of a Fast Track process to allow agencies to obtain timely feedback on service delivery while ensuring that the information collected is useful and minimally burdensome for the public, as required by the Paperwork Reduction Act of 1995 (PRA). As a result, ACF established the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery.

In order to work continuously to ensure that our programs are effective and meet our customers' needs, ACF uses the Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery 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 ACF to garner customer and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. Over the past three years, ACF submitted over 200 GenICs under this generic mechanism. The information collected helps ensure that ACF customers and stakeholders have an effective, efficient, and satisfying experience with ACF programs. This feedback provides insights into customer or stakeholder perceptions, experiences and expectations; provides an early warning of issues with service; or focuses 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 ACF and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management and outreach/support such as T/TA and meetings.

2. Purpose and Use of the Information Collection

[1] https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2011/m11-26.pdf

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. ACF collects, analyzes, and interprets information gathered through these GenICs to identify strengths and weaknesses of current services and make improvements based on feedback. The solicitation of feedback targets areas such as: timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. ACF uses the feedback to plan and inform efforts to improve or maintain the quality of services offered and provided to stakeholders including, but not limited to program participants, funding recipients, experts, and the public. If this information is not collected, vital feedback from customers and stakeholders on ACF's services will be unavailable.

ACF will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used internally for general service improvement and program management purposes. The main purpose is not for release outside of the agency, but findings may be shared publicly, if appropriate (see section A16);
- Information gathered will not be used for the purpose of substantially informing influential policy decisions [2];
- 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, ACF will submit an information collection request to OMB for approval through an alternate PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, ACF will submit a standardized form (Attachment A: Fast Track Generic Submission Form) along with the

[2] 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."

proposed information collection (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:

- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- One-time or panel discussion groups
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys, online surveys)
- Customer comment cards/complaint forms
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Moderated, unmoderated, in-person, and remote usability studies (e.g., website or software usability tests)
- Testing of a survey or other collection to refine questions

Examples of collections that would generally not fall under this generic mechanism include:

- surveys that require statistical rigor because they will be used for making significant policy or resource allocation decisions;
- collections where the primary purpose of the data collection is to publish results; and
- collections that are intended for the purpose of basic research and that do not directly benefit the agency's service delivery.

At the time of this submission (April 2024) 98 of the previously approved GenICs are currently still in use and are included with this submission. To view a list of these GenICs that ACF will continue to use along with a direct link to the approved materials, see Attachment B: Ongoing Information Collections – Extension 2024.

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. Information about the mode will be included in each individual GenIC request.

4. Efforts to Identify Duplication and Use of Similar Information

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

5. Impact on Small Businesses or Other Small Entities

Small businesses or other small entities may be involved in these efforts, but ACF 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, ACF will not have timely information to adjust its services to meet customer needs.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing ACF's intention to request an OMB review of this information collection activity. This notice was published on December 11, 2023 (88 FR 85891) and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

ACF does not anticipate providing payment or other forms of remuneration to respondents for participation in most of the feedback information collections. Focus groups and cognitive laboratory studies are the main exceptions and ACF may propose tokens of appreciation for participation in these activities, if appropriate.

Per OMB guidance, tokens of appreciation are generally not appropriate for contractors, cooperators, grantees or program participants because they already have a pre-existing relationship with the agency. Tokens of appreciation are most appropriate where participants are being asked to participate in a focus group or cognitive interview. Incentives are generally not appropriate for questionnaires/surveys.

If token of appreciation is proposed, justifications will be provided in the individual GenIC request for the specific activities.

For any collection over 90 minutes, participants may be offered a token of appreciation to account for incidental expenses (transportation, child care, lost wages, etc.).

10. Assurance of Confidentiality Provided to Respondents

In general, assurances of confidentiality are not necessary for the GenICs under this umbrella generic. Instead, respondents will be informed of assurances of privacy of information shared, as applicable and appropriate for the specific GenIC. If a confidentiality pledge is deemed appropriate and feasible, ACF 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 ACF includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge with the GenIC request.

11. Justification for Sensitive Questions

In general, no questions will be asked that are of a sensitive nature. If sensitive questions are deemed necessary and appropriate for a specific GenIC, justification will be provided with the GenIC request.

12. Estimates of Annualized Burden Hours and Costs

Burden Estimates

A variety of instruments and modes are used to collect information from respondents. Since the previous approval of this umbrella generic in 2021, ACF has submitted over 200 GenICs and requested over 26,000 hours in burden. Requests have varied in terms of number of respondents and the estimated time per response. Most, but not all, requests include only one response per respondent. The estimated time per response varies greatly based on the type of instrument, but most requests fall between 5 minutes to 1 hour per response. We have updated the estimated number of responses per respondent to 2 based on averages over the past three years. Other estimates remain the same.

<u>Ongoing GenICs</u>

At the time of this submission 98 of the previously approved GenICs are currently still in use and are included with this submission. The burden hours associated with these GenICs is 15,196 hours. To view a list of these GenICs that ACF will continue to use, including associated burden and a direct link to the approved materials, see Attachment B: Ongoing Information Collections – Extension 2024.

<u>New Burden</u>

The estimated burden for the next three years is provided in the following table. The table is illustrative, based on previous experience, and we may use more or less burden within each type of request.

Type of Collection	Total Number of Respondents	Average Total Number of Responses Per Respondent	Average Burden Hours Per Response For Types of Collections	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Surveys	175,000	2	.5	50,000	$59.52	$2,976,000
Comment Cards/Forms			.25			
Feedback Questions			.083			
Focus Groups, Discussions, Cognitive Studies			1			

Total Burden Request

The total burden request for this extension, to include ongoing and new burden, is 65,196 hours (15,196 + 50,000).

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for All Occupations [00-0000] and mean wage data from May 2022, which is $29.76 per hour. To account for overhead and fringe benefits, this wage was multiplied by 2, which is $59.52. https://www.bls.gov/oes/current/oes_nat.htm#00-0000

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

No other costs are anticipated.

14. Annualized Cost to the Federal Government

The anticipated cost to the Federal Government varies based on the individual GenICs and each individual GenIC will provide estimates specific to that request. We have estimated the average annual estimate for GenICs to be about $2,500, but the actual amount can vary greatly from a few hundred dollars to a few thousand depending on the type of feedback activity and the number of activities included in a single request (ex. Feedback from multiple meetings versus feedback from an individual webinar).

Over the past three years, ACF submitted over 200 GenICs under this generic mechanism. Using an average estimate of $2,500 per GenIC, we estimate the total cost to the federal government to be

$600,000 and annual cost to be $200,000.

15. Explanation for Program Changes or Adjustments

This request is for a revision. There are no changes to the proposed types, or the uses of the information collected through GenICs submitted under this umbrella generic. Burden estimates have been updated to reflect ACF's use of this generic mechanism since the most recent approval in 2021 and anticipated use over the next three years. Minor edits have been incorporated into the supporting statements to ensure the document is clear and up to date.

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 generally not intended for publication. However, in some circumstances, ACF may publish information collected under this generic mechanism. When this occurs, ACF will communicate the qualitative nature of the results and indicate that they are not generalizable to the population of study.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.