

1 SUPPORTING STATEMENT A

Fast Track Generic Clearance for the Collection of Qualitative Feedback on the Substance Abuse and Mental Health Services Administration (SAMHSA) Service Delivery

Check off which applies:

- ☐ New
- ☐ Revision
- ☐ Reinstatement with Change
- ☐ Reinstatement without Change
- ☒ Extension
- ☐ Emergency
- ☐ Existing

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 Substance Abuse and Mental Health Services Administration (SAMHSA) seeks to obtain the Office of Management and Budget (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 SAMHSA 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 SAMHSA'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 SAMHSA and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

The Fast Track Generic Clearance for the Collection of Qualitative Feedback on the Substance Abuse and Mental Health Services Administration (SAMHSA) Service Delivery replaced multiple previously approved SAMHSA information collections including 0930-0197 Voluntary Customer Satisfaction Surveys to Implement Executive Order 12862 in the Substance Abuse and Mental Health Services Administration (SAMHSA), 0930-0196 Pretesting of Substance Abuse Prevention and Treatment and Mental Health Services Communications Messages, and 0930-0313 SAMHSA's Publications and Digital Products Website Registration Survey. The active information collections (ICs) under Generic collections 0930-0196 and 0930-0197 were transferred to the new Fast Track Generic. After the ICs transferred, the 0196 and 0197 Generic collections were discontinued. The 0930-0313 SAMHSA's Publications and Digital Products Website Registration Survey consisted of customer satisfaction/feedback questions along with a SAMHSA website survey and a SAMHSA store survey developed utilizing the main pool of questions. The 0930-0313 information collection became an IC under this Fast Track once it was approved and the 0930-0313 information collection request (ICR) was discontinued. SAMHSA will continue due diligence to improve efficiency and lower burden by determining if other information collections are better served by becoming part of the Fast Track Generic.

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. SAMHSA 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 SAMHSA's services will be unavailable.

SAMHSA 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 SAMHSA (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;
- 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;

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 on important public policies or important private sector decisions."

- 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, SAMHSA will submit an information collection request to OMB for approval through the normal Paperwork Reduction Act (PRA) process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form (Attachment 1) 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 five 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)

- Telephone interviews/surveys
- Social media or web-based polls/surveys

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.

SAMHSA has an established internal review process 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.

3. Use of Information Technology

If appropriate, SAMHSA will collect information electronically and/or use online collaboration tools to reduce burden. Improved technology in the collection and processing of data will be used to reduce respondent burden and will make processing maximally efficient. When telephone interviews are used, computer assisted telephone interviewing (CATI) will be employed whenever possible. Self-administered questionnaires will be collected via online surveys. SAMHSA may also explore conducting focus groups virtually with treatment providers or consumers if appropriate.

4. Efforts to Identify Duplication of Information

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

5. Impact on Small Businesses or Other Small Entities

Small business or other small entities may be involved in these efforts, but SAMHSA 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. Therefore, there is no significant impact for small entities.

6. Consequences of Collecting the Information Less Frequently

Without these types of feedback, SAMHSA 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. The information collected will be voluntary and will not be used for statistical purposes.

8. Consultations Outside SAMHSA

In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment was published in the *Federal Register* on August 27, 2025, (90 FR 41836). No comments were received. A 30-day notice for public comment was published in the *Federal Register* on December 29, 2025, (90 FR 60734).

9. Renumeration of Respondents

SAMHSA 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, SAMHSA may provide stipends of up to \$50. In the case of in-person focus groups, SAMHSA 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 SAMHSA or other facility to participate. If such information collections include hard-to-reach groups and SAMHSA plans to offer non-standard stipends, SAMHSA will provide OMB with additional justifications in the request for clearance of these specific activities.

10. Assurance of Confidentiality

If a confidentiality pledge is deemed useful and feasible, SAMHSA 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 SAMHSA includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

The protection of respondents' identification and information will be assured to the maximum extent allowed by law. Participation will be voluntary and, to the extent possible, responses will be anonymous. In instances where respondent identity is needed (e.g., for follow-up of non-respondents, or for a longitudinal design), the information collection will fully comply with all aspects of the Privacy Act (System of Records 09-30-0036, Alcohol, Drug Abuse and Mental Health Epidemiologic and Biometric Research Data). Respondents will be assured that neither their participation/non-participation nor any responses to items will have any effect on their eligibility for or receipt of services.

11. Questions of a Sensitive Nature

Some studies require the inclusion of people who match selected characteristics of the target audience, which SAMHSA is trying to reach. This sometimes requires asking a question about race/ethnicity, income, education, and/or drug abuse or mental health problems on the initial

screening questionnaire used for recruiting. Potential participants are informed that this is being done to make sure that SAMHSA speaks with the kinds of people for whom its messages are intended. Again, respondents will be assured that the information is voluntary and will be handled in a confidential manner.

Since SAMHSA communications are concerned with the treatment of mental health problems, some projects may involve asking questions about (or discussing) how one perceives his/her own personal risk for such problems. Fears of and experiences with mental illness may be covered. This information is needed to gain a better understanding of the target audience so that the messages, strategies and materials designed will be appropriate and sensitive. Questions of this nature require some sensitivity in how they are worded and approached. In face-to-face data collections, questions of this kind will generally be asked later in the interview or group discussion when respondents are more comfortable with the interview situation and are more at ease with the interviewer/moderator. As noted in Section A.10., participants will already have been informed at the beginning about the nature of the activity and the voluntary nature of their participation. The interviewer/moderator makes it clear that they do not have to respond to any question that makes them uncomfortable.

Raw data from data collections that include sensitive information (for example, screening questionnaires and audio tapes) will not be retained once the data has been extracted and aggregated; nor will the information become part of a system of records containing permanent identifiers that can be used for retrieval.

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 (60,250) are based on the number of collections we expect to

conduct over the requested period for this clearance. The burden estimates were calculated based on replacing previously approved burden hours for ICRs 0930-0197, 0930-0196 and 0930-0313 and internal assessments of projected IC submission over the next three years.

Estimated Annual Reporting Burden						
Type of Collection	No. of Respondents	Response per Respondent	Hours per Response	Total Hours	Hourly Wage Rate (\$)	Total Hour Costs (\$)
In-person surveys, online surveys, telephone interviews/surveys, in-person observation/testing, interviews	75,000	1	0.37	27,750	\$27.00 ²	\$749,250.00
Focus groups	10,000	1	2	20,000	\$27.00	\$540,000.00
Self-administered questionnaires, customer comment cards, interactive voice surveys	10,000	1	0.25	2,500	\$27.00	\$67,500.00
Unspecified collection formats	10,000	1	1	10,000	\$27.00	\$270,000.00
Totals	105,000			60,250		\$1,626,750.00

13. Estimates of Annualized Cost Burden to Respondents

No costs are anticipated.

² The hourly wage of \$27.00 was calculated based on an average of the weighted 2021 NSDUH respondents' personal annual income hourly wage of \$28.00 and a \$25.94 hourly wage based on the Occupational Employment and Wages, Mean Hourly Wage rate for Community and Social Service Occupations (<https://www.bls.gov>).

14. Annualized Cost to the Government

The estimated annual cost to the government is approximately \$3,083,218 annually. These costs are comprised of instrument preparation, implementation an estimate of applicable costs, such as operational expenses (e.g., equipment, overhead, printing, postage and analysis; survey preparation, conduction support staff), contractor payments and analysis; and manager survey review any other expense that is necessary to collect the information approved under this generic clearance. The estimated annualized cost was calculated by combining the annual costs of \$2,212,500 for 0930-0197; \$363,000 for 0930-0196 and \$7,218 for 0930-0313 for a sum of \$2,583,218 along with a historical analysis of annualized costs for IC submissions versus use of Generic ICRs that supports the addition of \$500,000 for the final annualized cost to the government of \$3,083,218.

15. Change in Burden

There is no change in burden as this is a new information collection request.

16. Plans for Analysis and Timetable of Key Activities

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 SAMHSA does not intend to publish its findings, SAMHSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests).

SAMHSA will disseminate the findings when appropriate, strictly following SAMHSA'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. Exemptions for Display of Expiration Date

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 SAMHSA does not intend to publish its findings, SAMHSA may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests).

SAMHSA will disseminate the findings when appropriate, strictly following SAMHSA'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.

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.