Supporting Statement A

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery (VBA, VHA, NCA)

OMB Control Number: 2900-0770

Summary of Changes from Previously Approved Collection:

- The anticipated number of annual responses has decreased based upon agency program data.
- The anticipated burden hours have decreased based upon agency program data.
- The generic clearance supporting statement template has not changed and is included in the ICR in ROCIS.
- VA did not receive comments on the 60-day FRN.

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. In order to work continuously to ensure that our programs are effective and meet our customers' needs, the Department of Veterans Affairs (VA) seeks to obtain OMB approval of a generic clearance to collect qualitative feedback on our service delivery for Veterans Benefits Administration (VBA); Veterans Health Administration (VHA); and National Cemetery Administration (NCA). By qualitative feedback, we mean information that provides useful insights on perceptions and opinions, but not statistical surveys that yield quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable these Administrations of the Department of Veterans Affairs to garner customer and stakeholder feedback in an efficient and 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 of information will allow for ongoing, collaborative, and actionable communications between the Agency and its customers and stakeholders. They will also allow feedback to contribute directly to the improvement of program management.

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, 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. VA 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 provision of services will be unavailable to the Agency.

VA 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];
- 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 renumeration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained by VA.

If these conditions are not met, VA will submit an information collection request to OMB for approval through the regular 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 or 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:

- Program Satisfaction Surveys
- Customer comment cards/complaint forms
- Small discussion groups
- Focus Groups of customers, potential customers, delivery partners, or other stakeholders
- Qualitative Customer Satisfaction Surveys (e.g., post-transaction surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

[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.”

VA 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.

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.**

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

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.**

   No similar data is gathered or maintained by VA or is available from other sources known to VA.

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

   Small business or other small entities may be involved in these efforts, but VA will minimize the burden on them for information collections approved under this clearance by sampling, 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 these types of information collections, VA will not have timely feedback to adjust its services to meet customer needs.

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. a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, 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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, July 31, 2026. The 60-Day FRN citation is 91 FR 48508. VA did not receive public comments on the 60-day FRN.

A 30-Day Federal Register Notice for the collection published on Wednesday, October 21, 2026. The 30-Day FRN citation is 91 FR 66623.

b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

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

Generally, VA will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. However, in the case of in-person focus groups, VA may provide stipends up to $25. 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, VA will provide OMB with additional justifications in the request for clearance of these specific activities.

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.

VA will provide a Privacy Notice for generic information collections and will indicate whether or not the Privacy Act of 1974 applies – because many generic information collections are anonymous and do not collect personally identifiable information (PII). The statement will include assurances of confidentiality, as necessary. If VA includes a pledge of confidentiality, it will contain any required citation of the statute or regulation supporting the pledge. The notice also will explain the purpose for collecting the information and assure the respondent that participation is voluntary and failure to respond will have no impact on any benefits to which the respondent may be entitled.

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

There are no questions of a sensitive nature.

12. Estimate of the hour burden of the collection of information:

a. The number of respondents, frequency of responses, annual hour burden, and explanation for each form are reported as follows:

Total Annual Number of Responses: **425,000**

Total Annual Time Burden (hrs): **201,250 hours**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested are based on the number of annual collections VA expects to conduct under this clearance.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency of Response	Minutes per Response	Total Hours
Program Satisfaction Surveys	125,000	1	30 minutes	62,500
Focus Groups	35,000	1	60 minutes	35,000
Customer Comment Cards	15,000	1	15 minutes	3,750
Small Discussion Groups	10,000	1	30 minutes	5,000
Qualitative Customer Satisfaction Surveys	125,000	1	30 minutes	62,500
In-person Observation Testing	15,000	1	30 minutes	7,500
Patient Surveys	100,000	1	15 minutes	25,000
Total	**425,000**			**201,250**

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13.

See chart in subparagraph 12a above.

c. Provide estimates of annual cost to respondents for the hour burdens for collections of information. 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.

VA cannot make assumptions about the population of respondents because of the variability of factors, such as the educational background and wage potential of respondents. Therefore, VHA used general wage data to estimate the respondents' costs associated with completing the information collection.

The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the mean hourly wage is $32.66 based on the BLS wage code – "00-0000 All Occupations." This information was taken from the following website: https://www.bls.gov/oes/current/oes_nat.htm.

Legally, respondents may not pay a person or business for assistance in completing the information collection. Therefore, there are no expected overhead costs for completing the information collection. VA estimates the total cost to all respondents to be $6,572,825.00 (201,250 burden hours x $32.66 per hour).

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).

a. There are no capital, start-up, operation, or maintenance costs.
b. Cost estimates are not expected to vary widely. The only cost is that for the time of the respondent.
c. There is no anticipated recordkeeping burden beyond what is considered usual and customary.

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 estimated cost to the Federal Government is approximately $465,000 annually. These costs are comprised of, for example: equipment, overhead, printing, postage, support staff, contractor payments, and any other expense that is necessary to collect the information approved under this generic clearance.

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

There is a decrease in the anticipated number of annual responses and burden hours based upon agency program data.

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

    VA will include the expiration date on all surveys.

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 – and there are no exceptions.