Supporting Statement A
for Paperwork Reduction Act Submission
Generic Clearance for Improving Customer Experience
(OMB Circular A-11, Section 280 Implementation)
0960-0818

A. Justification

1. Introduction/Authoring Laws and Regulations

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 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. Description of 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, 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, in general, exempt from PRA review, subject to the caveats on page 3 (here) .

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

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

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

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, meaning they do not raise issues that warrant public comment;
- 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 the agency will comply with applicable legal and policy requirements to ensure its protection;
- 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. Use of Information Technology to Collect the Information

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. Why We Cannot Use Duplicate Information

SSA 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 we supply on these surveys does not duplicate on any other information collection.

5. Minimizing Burden on Small Respondents

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

6. Consequence of Not Collecting Information or Collecting it Less Frequently

Without regular mechanisms for collecting and generating customer insights, SSA is not able to provide the public with the highest level of service. SSA coordinates these activities 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 session.

7. Special Circumstances

These surveys are consistent with all the guidelines in *5 CFR 1320*. There are no special circumstances that would cause this information collection to be conducted in an unusual or intrusive manner. All participation will be voluntary. Should SSA 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. Solicitation of Public Comment and Other Consultations with the Public

The 60-day public comment notice was published in the Federal Register on June 26, 2026 (91 FR 38753). SSA received no comments.

The 30-day public comment notice was published in the Federal Register on August 27, 2026 (91 FR 55418).

9. Payment or Gifts to Respondents

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

10. Assurances of Confidentiality

SSA protects and holds confidential the information it collects in accordance with 4*2 U.S.C. 1306*, *20 CFR 401* and 4*02*, *5 U.S.C. 552* (Freedom of Information Act), *5 U.S.C. 552a* (Privacy Act of 1974), and OMB Circular No. A-130.

11. Justification for Sensitive Questions

None of our generic clearances under this OMB control number contain any questions of a sensitive nature.

12. **Estimates of Public Reporting Burden**

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)	0	0	0	0
Surveys to obtain feedback immediately following a transaction **– Limited to 15 questions and 5 minutes max**	5,955,560	1	5	496,297
Total	**5,955,560**			**496,297**

13. **Annual Cost to the Respondents (Other)**

This collection does not impose a known cost burden on the respondents.

14. Annual Cost To Federal Government

Below are the annual and triennial costs to the Federal Government for these generic clearance activities:

GC Plan Year	**Cost to the Federal Government**
Year 1	$72,228
Year 2	$72,228
Year 3	$72,228
3-YEAR TOTAL	**$216,684**

The total cost to the Federal government for conducting these generic clearances is **$216,684**. This represents the costs for conducting the surveys, payment to contractors, payment to respondents, and printing/distributing/mailing survey materials. For a complete listing of the cost of each generic clearance activity, see the document entitled "Categorization of GC Activities /w Totals," posted in the "Manage ICR Documents" page in ROCIS.

15. **Program Changes or Adjustments to the Information Collection Request**

There are no changes or adjustments to the Information Collection Request.

16. **Plans for Publication Information Collection Results**

SSA makes no attempt to generalize the findings from these three groups of activities to be nationally representative or statistically valid. They are meant to compliment and help to contextualize performance and evaluation data as part of a three-pronged approach to understanding Federal program implementation and opportunities for improvement (Performance, Evaluation, and "Feedback" data[3]).

Customer Research: Insights gleaned from qualitative customer research may be presented publicly in the format of a conceptual user persona or customer journey map. Customer research can take anywhere from 6 weeks for a short sprint to a full fiscal year, depending on the specific project. The Agency expects most journey mapping efforts to last approximately 6 months, with a user persona and journey maps ready for feedback (both from internal and external to government stakeholders) within one month of completing customer research. Publicly available Journey maps include specific language to contextualize their use and will be included in specific requests. This language can include something like:

What should I know about journey maps?
Journey maps are living documents—continually refined and revisited. There is never a "final" version, and these maps are meant to serve as a summary of the voices of actual customers of U.S. Government services. A map may not precisely document the way a Government program is meant to be navigated, accessed, or used. It might not capture every government program or resource available to a customer segment. However, it is the product of a qualitative research approach to gather insights from customers' actual experiences. These findings can help us to identify areas for high-impact improvements across delivery channels and organizational silos.

Customer Feedback: Once touchpoint surveys are implemented at transaction points along the customer journey interacting with Federal services, SSA submits data from the A-11 Standard CX Feedback survey to OMB quarterly for review and publication in a summary dashboard on performance.gov.
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 standard A-11 CX Feedback survey
- Distribution of the responses across the 5 point Likert scale for each of the standard questions

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 CX feedback data.

[3] https://ssir.org/articles/entry/time_for_a_three_legged_measurement_stool

Testing of Services and Digital Products: Similar to Customer Research, this can range from a short two-day rapid feedback from users within an Agile product development sprint or longer effort to gather more extensive feedback from multiple physical locations.

17. Displaying the OMB Approval Expiration Date

SSA will include the OMB Control Number and collection expiration date at any qualitative feedback or testing activity and on each survey.

18. Exceptions to Certification Statement

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