SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSION

Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery
OMB # 1405-0193

A. JUSTIFICATION

1. *Why is this collection necessary and what are the legal statutes that allow this?*

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 State seeks to obtain 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 the State Department to gather 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 the Department'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 the Department of State and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. *What business purpose is the information gathered going to be used for?*

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. The Department 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 Department's services will be unavailable.

The Department of State 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 wil 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.

If these conditions are not met, the Department 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 and collection instruments. 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:

- 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;

[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."

- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys)
- In-person observation testing (e.g., website or software usability tests)

3. *Is this collection able to be completed electronically (e.g. through a website or application)?*
   If appropriate, the Department will collect information electronically and/or use online collaboration tools to reduce burden.

4. *Does this collection duplicate any other collection of information?*
   No similar data are gathered or maintained or are available from other sources known to the Department.

5. *Describe any impacts on small business.*
   Small business or other small entities may be involved in these efforts but the Department 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. *What are consequences if this collection is not done?*
   Without these types of feedback, the Department will not have timely information to adjust its services to meet customer needs.

7. *Are there any special collection circumstances?*
   There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. *Document publication (or intent to publish) a request for public comments in the Federal Register*

   The Department of State received one public comment in response to the proposed extension of this information collection. The commenter expressed interest in greater transparency regarding the specific survey instruments and sub-collections included under the "Various Public Surveys" generic clearance and requested additional information about their scope, target audiences, administration methods, estimated respondent burden, and the availability of a public inventory.

   The Department of State appreciates the commenter's interest in transparency and its commitment to ensuring that information collections are clearly described and appropriately supported under the Paperwork Reduction Act (PRA).

   The "Various Public Surveys" collection is intended to provide a streamlined mechanism for collecting voluntary feedback from members of the public who interact with the Department's programs, services, and facilities. These collections support the

Department's efforts to evaluate customer experience, identify opportunities for improvement, and enhance service delivery across domestic and overseas operations.

The Department of State received one public comment in response to the proposed extension of this information collection. The commenter expressed interest in more information regarding the specific survey instruments and sub-collections included under the "Various Public Surveys" generic clearance; specifically, information about their scope, target audiences, administration methods, estimated respondent burden, and the availability of a public inventory. The Department appreciates the comment and directs the commenter to the data on https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202402-1405-001. Checking the "All" box at the top of that page will display a list of all of the surveys included under this information collection, along with their associated instruments and data.

The Department will continue to ensure that information collections conducted under this generic clearance remain within the approved scope and comply with applicable PRA requirements. Information collections will be reviewed and submitted for approval, as applicable, in accordance with established Department and OMB procedures.

The Department appreciates the commenter's recommendations and remains committed to using public feedback to improve its programs and services while ensuring that information collections are conducted in accordance with the PRA.

9. *Are payments or gifts given to the respondents?*

The Department will not provide payment or other forms of remuneration to respondents of its various methods of collecting feedback. Focus groups and cognitive laboratory studies are the exceptions.

In the case of in-person cognitive laboratory and usability studies, the Department may provide stipends of up to $40. In the case of in-person focus groups, the Department 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 the agency or other facility to participate. If such information collections include hard-to-reach groups and the Department plans to offer non-standard stipends, we will provide OMB with additional justifications in the request for clearance of these specific activities.

10. *Describe assurances of privacy/confidentiality*

If a confidentiality pledge is deemed useful and feasible, the Department 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 or with authorized persons in accordance with whistleblower provisions. If a collection includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. *Are any questions of a sensitive nature asked?*
No questions will be asked that are of a personal or sensitive nature.

12. *Describe the hour time burden and the hour cost burden on the respondent needed to complete this collection*
A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (116,667) are based on the number of collections we expect to conduct over the requested period for this clearance and their individual response times.

The annual hour cost burden is estimated to be $3,000,675 based on the BLS tables of average wages for "all occupations" $25.72[2] x number of annual hours 116,667.

Estimated Annual Reporting Burden Chart:

Type of Collection	No. of Respondents	Annual Frequency per Response	Avg. Hours per Response	Total Annual Hours	3 Year Total Hours	Cost to Government
Customer Satisfaction Surveys	2,000,000	1	3.5 minutes	116,667	350,001	$750,000

13. *Describe the monetary burden to respondents (out of pocket costs) needed to complete this collection.*
There are no costs to respondents.

14. *Describe the cost incurred by the Federal Government to complete this collection.*
The anticipated cost to the Federal Government for this collection is estimated to be $750,000. These administrative costs include one office staff member using approximately 1% of their time to review and process materials. Costs also include publishing, printing, web support, and management review.

15. *Explain any changes/adjustments to this collection since the previous submission*
No program changes or adjustments are being reported.

16. *Specify if the data gathered by this collection will be published.*

[2] Source: Bureau of Labor Statistics, https://www.bls.gov/bls/blswage.htm, May 2019 National Occupational Employment and Wage Estimates, United States

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 the Department of State does not intend to publish its findings, we may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). The Department 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 applicable, explain the reason(s) for seeking approval to not display the OMB expiration date.*
The OMB expiration date will be displayed on each collection instrument.

18. *Explain any exceptions to the OMB certification statement below.*
The Department is not seeking exceptions to the certification statement.

B. STATISTICAL METHODS

Data collection methods and procedures will vary; however, the primary purpose of these collections will be for internal management purposes; there are no plans to publish or otherwise release this information.

1. **Universe and Respondent Selection**

The activities under this clearance may involve samples of self-selected customers, as well as convenience samples, and quota samples, with respondents selected either to cover a broad range of customers or to include specific characteristics related to certain products or services. Results will not be used to make statements representative of the universe of study, to produce statistical descriptions (careful, repeatable measurements), or to generalize the data beyond the scope of the sample. The specific sample planned for each individual collection and the method for soliciting participation will be described fully in each collection request.

Qualitative surveys are tools used by program managers to change or improve programs, products, or services. The accuracy, reliability, and applicability of the results of these surveys are adequate for their purpose.

The samples associated with this collection are not subjected to the same scrutiny as scientifically drawn samples where estimates are published or otherwise released to the public.

2. **Procedures for Collecting Information**

Data collection methods and procedures will vary and the specifics of these will be provided with each collection request. The Department expects to use a variety of methodologies for these collections. For example, the Department or its contractors may use commercial survey-specific software to automate its collection and analysis of feedback. In addition to physical copies, information collection instruments may be electronically disseminated and/or posted on target pages of appropriate web sites. Telephone scripts, personal interviews, and focus groups with professional guidance and moderation may also be used.

3. Methods to Maximize Response

Information collected under this generic clearance will not yield generalizable quantitative findings; it can provide useful customer input, but it does not yield data about customer opinions that can be generalized.

4. Testing of Procedures

Pretesting may be done with internal staffs, a limited number of external colleagues, and/or customers who are familiar with the programs and products. If the number of pretest respondents exceeds nine members of the public, the Department will submit the pretest instruments for review under this generic clearance.

5. Contacts for Statistical Aspects and Data Collection

Each program will obtain information from statisticians in the development, design, conduct, and analysis of customer/partner service surveys, when appropriate. This statistical expertise will be available from agency statisticians or from contractors and the Department will include the names and contact information of persons consulted in the specific information collection requests submitted under this generic clearance.