

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT 1995 SUBMISSIONS
CONTROL NUMBER 1225-0059
CUSTOMER SATISFACTION SURVEYS AND CONFERENCE EVALUATIONS
MASTER FOR GENERIC CLEARANCE**

Part A. Justification

1. Necessity of the information collection

The Department of Labor (DOL) plans to continue to conduct a variety of voluntary customer satisfaction surveys and conference evaluations, which will be specifically designed to solicit customer feedback on Government services and using such feedback regularly to make service improvements as prescribed by E.O. 13571, Streamlining Service Delivery and Improving Customer Service. Specific information collection instruments submitted under this information collection request (ICR) would qualify for the generic approval process but may not be suitable for clearance under the “fast-track” generic ICR, Control Number 1225-0088.

Customer satisfaction surveys provide important information on customer attitudes about the delivery and quality of agency products/services and will be used as part of an ongoing process to improve DOL programs.

The following considerations will be made for all customer satisfaction surveys:

- Collect customers’ opinions of what they want and their satisfaction with what they are getting;
- Provide credible confidentiality (if applicable);
- Collect information that customers perceive as innocuous and of potential benefit to them (e.g., improved products/services); and
- Collect “actionable” items (items that can be changed within existing constraints).

Additionally, the following considerations will be made for all customer satisfaction surveys employing statistical methods:

- Collect information that has been pre-tested to ensure that the instruments are easy to complete and provide useful needed information.
- Include procedures necessary to ensure high response rates when it is necessary to make decisions on the results or to make generalized statements about the customers (i.e., quantitative information).

The DOL requests to continue inclusion in this generic clearance for the use of conference evaluation forms. These evaluation forms would be used by DOL agencies who conduct occasional user conferences to educate and inform their users both Federal and non-Federal. The evaluation forms are a valuable tool for determining the usefulness

of conferences, in developing future conferences, and in providing services/products to DOL customers.

Agencies seeking to conduct a customer satisfaction survey or conference evaluation will submit a Customer Satisfaction Survey and Conference Evaluation Clearance Form, which will include the following:

Section A -- Supplemental Supporting Statement:

- Title of the Survey
- Compliance with 5 CFR 1320.5
- Assurances of confidentiality
- Federal cost
- Requested expiration date
- Number of respondents
- Percent of responses receive electronically
- Frequency
- Burden hour estimates (average response time and annual hours)
- Abstract

Section B -- Surveys and Evaluations Employing Statistical Methods

- Description of Statistical methodology (if applicable);
- Consultation with persons outside the Department;
- Office of Chief Evaluation Officer concurrence when indicated under DOL procedures
- Any pretest information

The DOL will submit each instrument to the Office of Management and Budget (OMB) at least 15 working days prior to the start of the survey. The OMB will evaluate the collection instrument for compliance with the Paperwork Reduction Act of 1995. The DOL requests that the OMB issue a notice of action or issue a passback via email within a 15-working-day time period. All customer satisfaction surveys and conference evaluations will be voluntary and will not require record-keeping, additional research, or documentation of responses.

The DOL will follow established procedures according to the Department of Labor Manual Series (DLMS) 1-300. This policy document establishes adequate internal independent review from the sponsoring programs to evaluate each customer satisfaction survey. This review will strive to address Departmental as well as individual program agency concerns, goals, and objectives. The Office of the Chief Evaluation Officer will review and approve customer satisfaction surveys statistical aspects in accordance with DLMS 1-300, as noted above. An OCEO concurrence sheet will also be provided.

2. Purpose of the information collection

These customer satisfaction surveys and conference evaluations will be designed to support the DOL mission and function. They will cover a wide range of agency

responsibilities including but not limited to pension programs, occupational safety and health programs, mine safety and health programs, veterans programs, employment and training programs, statistical programs, and labor management standards.

3. The use of automation, electronic, mechanical, or other technological collection techniques

Innovative information technologies will be considered whenever possible in the execution of customer satisfaction surveys. Every possible effort will be considered to streamline each survey.

Since agencies provide different services, a single generic questionnaire could be unduly burdensome to the public and would lack the degree of specificity needed by the program office(s).

Agencies conducting customer satisfaction surveys will make use of the medium that their service relies upon where possible. For instance, an agency telephone hotline service may develop a telephone questionnaire; or, an agency that typically services mail requests for material will develop a mail-in questionnaire.

These voluntary questionnaires/evaluations will gather information from Departmental customers on subjects such as:

- the user's accessibility to the service
- the value the service has provided
- the quality and timeliness of the response/conference
- the demeanor of the agency representative that helped the user
- any additional questions or comments the respondent might have for the improvement of the service
- other undetermined customer satisfaction issues

The respondent may be asked to perform the following activities:

- a. For telephone and or face-to-face questionnaires
 - Listen to instructions
 - Provide oral responses
- b. For written questionnaires
 - Read instructions
 - Provide written responses
 - Return mail questionnaires
- c. Focus groups
 - Listen to an introduction and guidelines
 - Participate in discussions
 - Usability testing

- d. Bulletin boards
 - Read bulletin board notice
 - Provide appropriate response
- e. Internet surveys
 - Read instructions
 - Using an interactive web-based tools
 - Provide written responses
- f. Conferences
 - Read or listen to instructions
 - Provide written responses

4. Efforts to identify duplication

Customer satisfaction surveys and Conference Evaluations will not be designed to duplicate existing information. Each survey/evaluation will be assessed in accordance with DLMS 1-300 procedures to ensure that there is no duplication or overlap with other departmental programs. The data obtained from each questionnaire/evaluation will be unique, as each instrument will be tailored to a specific audience with specific questions relevant to the performance of the subject program, locality, conference topic, etc.

5. Impact on small businesses

While collections of information conducted under this generic clearance will not impose a significant impact on small entities, the DOL plans to minimize the burden in the following ways:

- It will allow respondents to provide information in a format convenient to them where possible, and
- It will limit the information requested to the least necessary while not compromising quality.

6. Consequences of less frequent collection

Customer satisfaction surveys and conference evaluations will be used in a variety of ways, including the improvement of product delivery and services. In the absence of these services, the Department will be unable to meet the requirements of E.O. 13571.

The DOL does not anticipate individual respondents will provide information on a recurring basis. The documentation forwarded to OMB prior to administering each instrument will include a description of the time period during which the information collection will take place and the frequency of response.

7. Explain any special circumstances

Each customer satisfaction survey will be conducted in a manner consistent with 5 CFR 1320. 5. Should the need arise to deviate from the requirements outlined in 5 CFR 1320.5, individual justification will be provided to OMB on a case-by-case basis as part of the Customer Satisfaction Survey Supplemental Supporting Statement.

8. Public comment Federal Register notice and Consultation with outside representatives

No comments were received as a result of the 60-day pre-clearance Federal Register notice published on September 10, 2012 (74, FR 55506). No comments have been received.

No specific consultations were conducted outside the Department of Labor with representatives of the public. The surveys conducted under this clearance are however, by nature, attempts to consult the public with the quality and content of the work of the Department.

9. Payment or gifts to respondents other than remuneration to contractors or grantees

It is not anticipated respondents will receive any payment or gifts for completing customer satisfaction surveys or conference evaluations; however, any nominal token for responding will be justified and approved in advance by the OMB.

10. Assurances of confidentiality provided to respondents and the basis

Where applicable, individuals and organizations contacted will be assured of the confidentiality of their replies under 42 USC 1306, 20 CFR 401 and 422, (Freedom of Information Act), 5 USC 552a (Privacy Act of 1974), the BLS confidentiality policy, and OMB Circular No. A-130. For any given instrument, any assurance of confidentiality will be supported by law.

11. Questions of a sensitive nature

No sensitive data will be collected.

12. Burden hour estimates and annualized costs to respondents for the hour burdens

DOL will submit each generic to be approved under this collection to the OMB, in a way that according adjusts the overall burden budget for the collection. Each individual survey instrument/evaluation form submitted to OMB along with specific burden estimates. These estimates will include the total number of respondents, frequency of collection, average minutes/hours per response, and total burden hours and burden hour costs.

The DOL bases the following burden estimates on Departmental experience with the program during FY 2010 through 2012 after making adjustments for two factors. The first factor is that it was not clear at the time of the 2009 ICR that the then somewhat new reginfo.gov database would not capture the burden imposed by some previously approved instruments the DOL intended to re-authorize. Upon OMB approval of this extension request, the DOL will submit a generic request to capture the burden for any instruments that DOL program agencies wish to continue. The second factor is that some of the generics previously approved under the 1225-0059 would now qualify for clearance under the 1225-0086 “fast-track” ICR. The DOL notes that while most instruments approved under this ICR are one-time surveys, because generics are not sunsetted in the reginfo.gov database, the annual burden will appear to be greater than it actually is.

The DOL believes 375,000 respondents will respond once to some instrument approved under this ICR, and the average burden imposed by any given instrument will be six minutes. This produces a total burden of 37,500 hours. $375,000 \text{ respondents} * 1 \text{ response each} * 0.1 \text{ hours} = 37,500 \text{ hours}$.

Respondents to instruments cleared under this ICR will come from a variety of backgrounds from students or the currently unemployed to highly paid professionals and managerial staff to business owners; consequently, to monetize this burden, the DOL has increased the average hourly earnings of all employees on private nonfarm payrolls for August 2012, as computed by the Bureau of Labor Statistics, of \$23.52 (see *The Employment Situation—October 2012* at 32 DOL, Bureau of Labor Statistics, http://www.bls.gov/news.release/archives/empsit_11022012.pdf) by 40 percent to account for other compensation costs such as fringe benefits. This produced a “fully loaded” hourly rate of \$32.93. The DOL estimates the value of respondent time to be \$1,234,875.

13. Total annual cost burden to respondents or record-keepers resulting from the collection

There are no start-up or annual operation and maintenance costs incurred by respondents.

14. Annualized cost to the Federal government estimates

The anticipated cost to the Federal Government is approximately \$213,009 annually. These costs are comprised of: printing or developing instruments at a cost of 10 cents each and fifty hours of a Federal employee or contractor time to develop and review instruments and review answers for each of 20 submitted collections. For purposes of this estimate, the DOL has assumed the hourly labor and overhead costs would equal 190 percent of the 2011 GS-12, step 5 RUS schedule. See http://www.opm.gov/oca/11tables/html/RUS_h.asp. For purposes of this estimate, the DOL has also calculated Federal costs based on the actual number of anticipated annual collections (20).

$375,000 \text{ responses} * \$0.1 \text{ cost} = \$37,500$.

20 collections x 50 hours x \$37.37 per hours x 190% = \$71,003.
Total estimated Federal cost: \$30,000 + \$213,009 = \$108,503.

15. Reasons for program changes or adjustments reported in Items 13 or 14 of the OMB 83-I

Changes to the estimated burden stem from revised estimates and not from discretionary program changes. Two factors were considered. The first factor that resulted in a revision to the estimate is that it was not clear at the time of the 2009 ICR that the then somewhat new reginfo.gov database would not capture the burden imposed by some previously approved instruments the DOL intended to re-authorize. As noted in item 12, upon OMB approval of this extension request, the DOL will submit a generic request to capture the burden for any instruments that DOL program agencies wish to continue. The second factor is that some of the generics previously approved under the 1225-0059 would now qualify for clearance under the 1225-0086 “fast-track” ICR.

16. Plans for publication

The results obtained from these various surveys will be disseminated to key policy and management officials, DOL employees, stakeholders, and the public, if applicable.

17. If seeking approval to not display the expiration date for OMB approval, explain reason(s)

Most customer satisfaction surveys and conference evaluations conducted under the generic clearance umbrella are one-time surveys. The Department is requesting an exemption from the requirement to print the reports clearance expiration date on its forms/surveys for one-time only surveys. All other customer satisfaction surveys will include the expiration date.

18. Exception to the certification statement identified in Item 19 of the OMB form 83-I

The DOL is not requesting an exception to the certification requirements.