

**Office of the Comptroller of the Currency**  
**Supporting Statement**  
**Generic Information Collection**  
**Qualitative Feedback on OCC Service Delivery**  
**OMB Control No. 1557-0248**

**A. Justification.**

**1. *Circumstances that make the collection 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 Office of the Comptroller of the Currency (OCC) seeks renewal OMB approval of a generic clearance to collect qualitative feedback on our service delivery. Qualitative feedback is information that provides useful insights on perceptions and opinions, but does not include statistical surveys or quantitative results that can be generalized to the population of study.

This collection of information is necessary to enable the OCC to solicit customer and stakeholder feedback in an efficient and timely manner, in accordance with our commitment to improving delivery of services. The information collected from our customers and stakeholders helps ensure that users have an effective, efficient, and satisfying experience with the OCC's programs. This feedback offers insights into customer or stakeholder perceptions, experiences, and expectations and can provide an early warning of issues with service and/or focus attention on areas where communication, training or changes in operations might improve delivery of products or services. These collections allow for ongoing, collaborative, and actionable communications between the OCC and its customers and stakeholders, and the resulting feedback contributes directly to improving program management.

**2. *Use of the Information:***

Improving OCC programs requires the ongoing assessment of service delivery. This means performing a 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 OCC will analyze and interpret information collected through this generic clearance to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The OCC will solicit feedback that targets areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Information provided by respondents will be used to plan and inform efforts to improve or maintain the quality of service offered to the public. If the OCC does not collect this information, vital feedback from customers and stakeholders on the OCC's services will be unavailable.

The OCC will only submit a specific information collection for approval under this generic clearance if the collection meets the following conditions:

- It is voluntary;
- It imposes a low burden on respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and a low cost on both respondents and the Federal government;
- It is non-controversial and does not raise issues of concern to other Federal agencies;
- It is targeted to solicit opinions from respondents who have experience with the program or will have such experience in the near future;
- It includes personally identifiable information (PII) only to the extent necessary, and the OCC does not retain the PII;<sup>1</sup>
- It gathers information intended to be used internally only for general service improvement and program management purposes and not intended for release outside of the OCC (if released, the OCC must indicate the qualitative nature of the information);
- It does not gather information to be used for the purpose of substantially informing influential policy decisions; and
- It gathers information that will yield qualitative information and will not be designed or expected to yield statistically reliable results or used to reach general conclusions about the population of study.

If these conditions are not met, the OCC will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a specific collection that meets the conditions of this generic clearance, the OCC will submit a standardized form to OMB along with supporting documentation, including a copy of the instrument. The submission will be automatically approved, unless OMB identifies issues within five business days.

The types of collections covered by this generic clearance 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 a website's usability;
- Qualitative customer satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys); and
- In-person observation testing (e.g., website or software usability tests).

### **3. *Consideration of the use of improved information technology:***

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<sup>1</sup> The OCC may retain PII only in limited circumstances, and if it does so, the OCC must comply with applicable requirements, restrictions, and prohibitions of the Privacy Act and other privacy and confidentiality laws that govern the collection, retention, use, and/or disclosure of such PII.

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

**4. *Efforts to identify duplication:***

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

**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 the OCC will minimize the burden imposed on them by information collections approved under this clearance through sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

**6. *Consequences to the Federal program if the collection were conducted less frequently:***

Without these types of feedback, the OCC will not have timely information to adjust its services to meet customer needs.

**7. *Special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320:***

Not applicable.

**8. *Efforts to consult with persons outside the agency:***

The OCC issued a notice for 60 days of comment regarding the collection on December 27, 2016, 81 FR 95301. No comments were received.

The OCC issued a notice for 30 days of comment regarding this collection on February 6, 2017, 82 FR 8259, and the OCC received one comment.

The commenter stated that OMB should not renew this information collection because it is duplicative of the OCC's Examination Questionnaire collection (OMB Control No. 1557-0199). The commenter believes that, on occasion, the OCC collects qualitative feedback from customers and stakeholders in its Examination Questionnaire, which is sufficient to achieve insights into customer and stakeholder perceptions, experiences, and expectations on OCC services and which fulfills the purpose of the Examination Questionnaire information. However, the Examination Questionnaire is limited to institution experience with the OCC, primarily in the context of examinations. In addition, the Fast Track Clearance enables the OCC to solicit input not only from institutions but from vendors and others who interact with the agency. This provides the OCC with valuable feedback that can be used to improve the agency's performance.

The commenter further stated that the OCC did not respond to comments submitted in response to the 60-day *Federal Register* Notice for the Examination Questionnaire collection. The comment received in response to the 60-day *Federal Register* Notice was addressed in the 30-day notice issued on June 30, 2016 (81 FR 42789, at 42790).

Finally, the commenter questioned why the information is being collected if it will not be used for the purpose of substantially informing influential policy decisions and will not yield statistically reliable results. OMB developed the Fast Track Clearance to provide timely feedback to agencies on service delivery while imposing minimal burden. OMB specifically stated that “surveys that require statistical rigor because they will be used for making significant policy or resource allocation decisions” are not eligible for the Fast Track Clearance process.<sup>2</sup> In order to improve OCC programs, the OCC conducts an ongoing assessment of service delivery. This involves a 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 OCC analyzes and interprets information collected to identify strengths and weaknesses of current services and make improvements in service delivery based on feedback. The OCC solicits feedback that targets areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of service delivery, and resolution of issues with service delivery. Information provided by respondents is used to plan and inform efforts to improve or maintain the quality of service offered to the public. If the OCC does not collect this information, vital stakeholder feedback on the OCC’s services will be unavailable.

**9. *Payment or gift to respondents:***

Not applicable.

**10. *Any assurance of confidentiality:***

The information will be kept confidential to the extent permitted by law.

**11. *Justification for questions of a sensitive nature:***

Not applicable. No personally identifiable information is requested.

**12. *Burden estimates:***

A variety of instruments and platforms will be used to collect information from respondents.

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<sup>2</sup>See generally, <https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/memoranda/2011/m11-26.pdf>.

See also, <https://www.digitalgov.gov/resources/paperwork-reduction-act-fast-track-process/>.

<b>Estimated Annual Reporting Burden</b>				
<b>Type of Collection</b>	<b>No. of Respondents</b>	<b>Annual Frequency per Response</b>	<b>Hours per Response</b>	<b>Total Hours</b>
Feedback on OCC Issuances and Seminars	3,000	2	.25	1500
Focus Groups	25	1	4	100
Usability Testing	3,000	1	.25	750
<b>Total Burden</b>				<b>2,350</b>

**13. Estimate of total annual costs to respondents (excluding cost of hour burden in Item #12):**

No costs are anticipated.

**14. Estimate of annualized costs to Federal government:**

None.

**15. Change in burden:**

Former Burden: 1,600 hours  
 Current Burden: 2,350 hours  
 Difference: + 750 hours.

The increase in burden is due to the projected increase in the number of customer service surveys to be conducted.

**16. Information regarding collections whose results are to be published for statistical use:**

Not applicable.

**17. Reasons for not displaying OMB approval expiration date:**

Not applicable.

**18. Exceptions to certification statement:**

Not applicable.

