

**Supporting Statement for Paperwork Reduction Act Generic Information Collection
Submissions for
“Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”**

A. JUSTIFICATION

1. Circumstances Making the Collection of Information 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 Internal Revenue Service (hereafter “the Agency”) 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 Agency to garner 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 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 will allow for ongoing, collaborative and actionable communications between the Agency and its customers and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information 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. The Agency 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 Agency's services will be unavailable.

The Agency 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 remuneration 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 Agency 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 (e.g., a copy of the 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:

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

The Agency 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. Consideration Given to Information Technology

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.”

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

4. Duplication of Information

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

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but the Agency will minimize the burden on them of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Consequences of Not Conducting Collection

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

7. Special Circumstances

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. Consultations with Persons Outside the Agency

We received one comment letter during the comment period in response to the Federal Register notice dated January 11, 2017 (82 FR 3383).

The comment letter suggested that there are opportunities to enhance the quality of the information collected under this approval number by including taxpayers currently participating in the whistleblower program. It was suggested, in the letter, that "Whistleblowers are an important stakeholder for the IRS and are as much entitled to quality agency services..." The letter will be forwarded to the Whistleblower program office for review and consideration in future actions of the program.

9. Payment or Gift

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

In the case of in-person cognitive laboratory and usability studies, the Agency may provide stipends of up to \$40. In the case of in-person focus groups, the Agency 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 agency plans to offer non-standard stipends, the Agency will provide OMB with additional justifications in the request for clearance of these specific activities.

10. Confidentiality

If a confidentiality pledge is deemed useful and feasible, the Agency 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. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge.

11. Sensitive Nature

No questions will be asked that are of a personal or sensitive nature.

12. Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (20,000) are based on the number of collections we expect to conduct over the requested period for this clearance.

Estimated Annual Reporting Burden					
Type of Collection	No. of Respondents	Annual Frequency per Response	Total responses	Hours per Response	Total Hours
Moderated and/or in-person	50	32	1600	1.05	1,680
Un-moderated, online	551	12	6612	0.25	1,653
Annually			8212		3,333
Requested 3 year approval			<u>x</u> 3		<u>x</u> 3
Total Time Burden Hours			24,636		10,000

2013-2016 Approvals

Summary reports for the following surveys were submitted approved and closed and are included as separate attachments to *this collection*.

1. Account Usability Test
2. Direct Pay Usability Test
3. eAuthentication Usability Study
4. IRS2Go v5 User Experience Study
5. IRS2Go Validation Usability Study
6. Responsive Payments Formative Usability Study

At the time of this submission, no information has been provided to support or determine whether the below Surveys were performed or cancelled. Any updates to these collection requests will be included in the next renewal request to OMB.

1. IRS Account Usability Test
2. External Leads External Customer Feedback 2014
3. Third Party Credential Authentication Usability Study Materials
4. IRS.gov MegaMenu Usability Study
5. IRS.gov Menu Labeling Usability Study 2
6. Search Label Research Study
7. Search Label Research Study #2

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The estimated annual cost to the federal government is \$80,560.

	2013-2016 Information Collections (IC)	Participant Incentives	Other Costs	Total
1	eAuthentication Usability Study	7200	2400	9600
2	IRS Account Usability Test	7200	2400	9600
3	IRS2Go v5 User Experience Study	0	0	0
4	External Leads External Customer Feedback 2014	0	0	0
5	IRS Authorizations Prototype – Usability Testing	2400	240	2640
6	Direct Pay Usability Test	10800	9600	20400
7	Third Party Credential Authentication Usability Study Materials	22880	960	23840
8	Responsive Payments Formative Usability Study	640	0	640
9	IRS2Go Validation Usability Study	640	5200	5840
10	IRS.gov MegaMenu Usability Study	0	2000	2000
11	IRS.gov Menu Labeling Study 2	0	2000	2000
12	Search Label Research Study	0	2000	2000
13	Search Label Research Study #2	0	2000	2000
	Grand Total	51,760	28,800	80,560

15. Reason for Change

There is a change to burden previously approved by OMB to reflect an agency estimate that is more representative of the actual numbers incurred.

	Requested	Program Change Due to New Statute	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Change Due to Potential Violation of the PRA	Previously Approved
Total Number of Responses	24,636			2,975,514		3,000,150
Total Time Burden (Hr)	10,000			790,040		800,040
Total Cost Burden (\$)	80,560			919,440		1,000,000

16. Tabulation of Results, Schedule, Analysis Plans

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 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). The Agency 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. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.