

SUPPORTING STATEMENT
FOR PAPERWORK REDUCTION ACT SUBMISSION

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is an extension of a currently approved submission.

On September 11, 1993, President Clinton issued Executive Order 12862, "Setting Customer Service Standards" which established a need to reform government practices and operations with the result that, when dealing with Federal agencies, all people would receive services that match or exceed the best service available in the private sector.

Section 1(b) of that Order required agencies to "survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services". Section 1 (e) requires agencies to "survey front-line employees on barriers to, and ideas for, matching the best in business." These Presidential requirements established an ongoing need for the Department of Education (ED) to be engaged in an interactive process of collecting information and using it to improve program services and processes. Agencies are therefore authorized to measure customer satisfaction and report results. In addition, the March 22, 1995 Presidential Memo "Improving Customer Service," states that customer views should be obtained to determine whether standards have been met on those matters which most concern the customer. This Master Plan represents the Department's continued commitment to improve products and services.

Surveys to be considered under this generic will only include those surveys that improve a customer service or collect feedback about a service provided. The results of the customer surveys will help ED managers plan and implement program improvements and other customer satisfaction initiatives. Focus groups that will be considered under the generic clearance will assess customer satisfaction with a direct service, be of limited size or scope, and/or will be designed to inform a customer satisfaction survey ED was considering. Surveys that have the potential to influence policy will not be considered under this generic clearance.

The types of surveys to be included in this clearance include customer surveys and focus groups. Program offices will submit a generic information collection that shall include all relevant information, including a statement of need, intended use of information, description of respondents, information collection procedures, expected response rates, justification for incentives and estimated burden.

ED has included Appendix A which contains the listing of all currently approved ED surveys to date and new surveys to be submitted during the next 3 years.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The primary objective in the Executive Order was that all entities and individuals directly served by ED will receive the highest quality of service comparable to private organizations. These individual and entities are defined as our “customers.”

In ED, senior management has clearly defined our ultimate customer as the learner of all ages. This ultimate customer might be classified in four primary groups: pre-school children, elementary and secondary students, postsecondary and graduate students, and adult learners. Besides these customers, ED also provides funds and services directly to: parents, teachers, principals, local education agencies, state education agencies, Governors and those committees and agencies which report directly to them, institutions of higher education, accreditation agencies, lenders, guarantee agencies, national special interest groups with an interest in education, contractors, grantees, and individuals seeking employment with ED. Each of these groups, while often also a partner in the education process, is to be considered an ED customer. As such, the expectations and requirements of each of these groups will need to be understood. The array of customer satisfaction surveys to be conducted by ED will assess these needs to help develop proposals to meet the needs at a level that matches or exceeds the best service available in the private sector.

In order to continue to meet these objectives, ED will establish an internal process where customer satisfaction is regularly monitored and measured. The results will be “fed back” into the ED programs’ planning and decision-making processes to improve the quality of ED program’s products and services. To do this, ED program offices will continue to conduct customer service focus groups and surveys.

Results from some surveys and focus groups will be used to establish customer-defined goals and standards for measuring ED progress toward those goals. Other surveys and focus groups will clarify those standards and evaluate ED performance. This will be an ongoing process of measuring customer satisfaction and then using that information to refine or redefine ED’s programs and processes. The survey results will be used to fulfill customer satisfaction reporting requirements in Executive Order #12862 and to improve ED’s services and products and their use. Without this institutionalized process, ED managers will have little basis for planning and implementing program improvements and other customer satisfaction initiatives.

Surveys that produce prevalence estimates or official statistics of any kind do not fall within the scope of this generic clearance for customer satisfaction surveys and focus groups.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision of adopting this means of collection. Also describe any consideration given to using technology to reduce burden.

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 set of potential respondents in each proposed customer satisfaction survey. Many programs will utilize and have utilized Internet home pages to seek public comment and suggestions. Others may propose the submission of comments with electronic submission of application and reports. Many of the approved customer satisfaction surveys have utilized electronic collection and submission technology.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information to be supplied on these surveys will not be duplicated on any other information collection. The Regulatory Information Management Service (RIMS) will review the proposed ED surveys to verify that the information sought is not already available and that the survey fits into a coordinated department-wide customer satisfaction program. Since the initial OMB approval of ED's umbrella clearance for customer satisfaction surveys, ED has been careful to ensure the streamlining in number of surveys, number of questions, and type of questions proposed for approval. In addition to these reviews, RIMS routinely runs reports of ED customer surveys to determine that there is no duplication among surveys.

There is no information available from any other source, which will enable ED to evaluate the satisfaction of our customers under the provisions of the Executive Order.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The information collected in these surveys will represent the minimum necessary to evaluate customer satisfaction with ED programs. It is expected that most survey instruments will be designed to take less than thirty minutes of the respondent's time.

The frequency for individual respondents is one time. Without a regular program of customer satisfaction surveys, the Department of Education will not be able to attain the commitment to "best in business" practices.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

These customer satisfaction measurement activities will be conducted only when specific information is required. The question of frequency is not an issue. There are no legal or technical obstacles to the use of technology in these information collection activities.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

These surveys will be consistent with all the guidelines in 5 CFR 1320.5(d)(2), and more specifically the guidelines in 5(d)(2)(v) which require that a statistical survey be designed to produce results that can be generalized to the universe of study. 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 ED 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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Program offices are responsible for monitoring and implementing public comments for improvement. These surveys are consistent and comply with the guidelines in 5 CFR 1320.8(d). Feedback from individuals and organizations served by ED are available upon request. A 60 day notice was published in the Federal Register on July 5, 2017 (82 FR 31049). No comments were received. A 30 day notice will be published.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents in these customer satisfaction or focus group surveys. If any are proposed for use, they will be small and ED will submit specific justification for each proposed use as part of the package submitted to OMB.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

These surveys and focus groups will provide all necessary assurances of confidentiality to the respondents, when needed. Although there is no requirement for such assurances in statute, the quality of this type of information requires respondent candor and anonymity. Customer surveys don't request personal identifiable information. If they do, justification will be provided with the individual customer survey according to the Privacy Act. In addition, NCES may assure confidentiality under The Education Sciences Reform Act of 2002, Title I, Part E, Section 183, as necessary. In most cases, collection of information will be voluntary and will originate from customers who have experience within the program that is the subject of each collection. Surveys that collect personally identifiable information must provide a confidentiality statement that cites the authority to collect the information.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There will be no questions of a sensitive nature in these customer satisfaction surveys. If any are used, ED will submit justification for each question used as part of the individual survey submission.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents by affected public type (federal government, individuals or households, private sector, business or other for profit, not-for-profit institutions, farms state, local or tribal government), frequency of response, annual hour burden, and an explanation of how the burden was estimated, including identification of burden type: recordkeeping, reporting or third party disclosure. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burden.
- Provide estimates of annualized cost to respondents of the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

The respondent burden averages from five (5) minutes to 1 hour per response for each survey, depending on the individual survey. This estimation has been based on previous surveys submitted. The respondents are estimate to average 60-90 minutes in each focus group discussion.

Each survey respondent will most likely submit one response per survey. The Department estimates 451,512 responses with a total burden of 115,194.

Each member of a focus group is expected to spend an average of 75 minutes per group. If four focus groups were held over the next year with an average of 10 participants per group, the total burden is estimated to be 50 hours (4 groups x 10 participants x 1.25 hours).

Burden for both activities is estimated at 115,344 hours and 451,632 responses.

The average hourly cost per respondent is estimated to be \$30.00.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)

- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and acquiring and maintaining record storage facilities.
- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Total Annualized Capital/Startup Cost : _____
Total Annual Costs (O&M) : _____
Total Annualized Costs Requested : _____

There are no costs to respondents except for those costs provided under number 12.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The cost required to read and evaluate the surveys and focus groups discussions by ED, including the time taken by individuals under contract to ED, is estimated to be 31,256 hours. Given an average hourly rate of \$35 per hour, the total cost to the Department is estimated to be \$1,093,964.

15. Explain the reasons for any program changes or adjustments. Generally, adjustments in burden result from re-estimating burden and/or from economic phenomenon outside of an agency's control (e.g., correcting a burden estimate or an organic increase in the size of the reporting universe). Program changes result from a deliberate action that materially changes a collection of information and generally are result of new statute or an agency action (e.g., changing a form, revising regulations, redefining the respondent universe, etc.). Burden changes should be disaggregated by type of change (i.e., adjustment, program change due to new statute, and/or program change due to agency discretion) and include both changes in burden hours and changes in cost burden.

This is an extension of a currently approved submission. Therefore, the Customer Survey 3-year total number of responses will be 451,632 and the total burden hours will be 115,344 hours. This estimate also includes 26,212 burden hours and 76,871 responses for new surveys anticipated during the next 3 years.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The responsibility to measure customer satisfaction is not a "project" with an assigned completion date. Instead, it is an interactive process, which is becoming incorporated into the fabric and culture of the department. The process will continue with the attached survey proposals for collecting information. There is no projected completion date.

As the information is collected, it will be evaluated by the sponsoring program offices and by the Regulatory Information Management Service and shared with any other program and support service managers and employees to whom it is relevant.

Customer satisfaction surveys employ statistical methods according to the OMB guidance. Experienced and trained ED researchers will be sought from the Principal Offices such as NCES in ED to serve as advisors to evaluate the methodological strengths and weaknesses of the

proposed survey instruments and plans. These experts will make recommendations, as needed, to improve the research initiative. These recommendations will be implemented in each approved collection activity.

OMB statistical experts, information collection experts, program specialists will be invited to participate with and advise the ED clearance office as their time permits. ED will consult with OMB about the expectations and standards of this important activity and will incorporate the OMB guidance in the ongoing internal clearance process. This feedback will enable ED to continuously improve the usefulness of these collection activities.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date will be displayed on all surveys.

18. Explain each exception to the certification statement identified in the “Certification of Paperwork Reduction Act Submissions”.

There are no exceptions to the certification.

Attachments:

Appendix A includes ED listings of all individual customer surveys and focus groups for to date. This appendix also includes the new surveys expected to be submitted during the next 3 years.