

**Supporting Statement for Paperwork Reduction Act Generic Information Collection Submissions for
“Fast Track Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery”
Department of Defense (DoD)**

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 Department of Defense (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

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

4. Duplication of Information

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.”

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Reducing the Burden on Small Entities

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

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. PRA Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultations with Persons Outside the Agency

A 60-Day Federal Register Notice (FRN) for the collection published on Wednesday, November 28, 2018. The 60-Day FRN citation is 80 FRN 81813.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Friday, February 15, 2019. The 30-Day FRN citation is 84 FRN 4451.

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 considered sensitive are being asked in this collection.

12. Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (50,000) are based on the number of collections we expect to conduct across the Department of Defense and over the requested period for this clearance.

Table 1 - Estimation of Respondent Burden

	Number of Surveys (Annual)	Number of Responses per Survey (Average)	Proposed Responses (Annual)	Estimated Completion Time (Average)	Burden Hours (Annual)
Total	400	3,000	1,200,000	15 min	300,000

With the estimated annual burden of 50,000 hours, the overall annual labor cost for respondents is estimated to be approximately \$1,378,000. An hourly wage of \$27.56 is used for all fast track respondents using the Department of Labor’s January 2019 Occupational Employment Statistics data for “All Occupations.” (http://www.bls.gov/oes/current/oes_nat.htm#00-0000)

Table 2 - Labor Cost of Respondent Burden

Type of Respondent	Total Burden Hours (Annual)	Average Hourly Wage - DOL 2019 (“All Occupations”)	Total Respondent Costs (Annual)
Target Population	300,000	\$27.56	\$8,268,000

13. Costs to Respondents

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Costs to Federal Government

While on-site federal contractor staff may be assigned to work on some of the individual fast track information collections (IC), the 2019 OPM General Schedule hourly labor rates for the Washington DC area were used to estimate all labor costs. Only minimal Operation and Maintenance (O&M) costs per IC are anticipated given that the majority of the generic information collections will be electronic or web-based with little or no printing or mailing costs. Any O&M costs per IC that are related to storage or system maintenance would be prorated across all projects being housed or maintained on the system. It is estimated that the average cost per fast track information collection will be approximately \$1,854. With 100 fast track information collections projected annually, the total annual cost to the federal government would be approximately \$185,368.

Table 3 - Cost Estimates Per Fast Track Information Collection

Type of Cost	Average Hours per IC	Average Hourly Rate	Average O &M Costs per IC	Average Cost per IC
Instrument development, programming, and administration preparation	16 hrs. per survey	\$37.13 (GS-12)		\$594.08
Data cleaning, analysis, and report writing	24 hrs. per survey	\$44.15 (GS-13)		\$1,059.60
Operational and Maintenance Costs			\$200.00	\$200.00
Total	40 hrs. per survey			\$1,853.68

Table 4 - Total Estimate of Costs to the Federal Government

Annual # of Surveys	Average Cost per Survey	Annual Cost
100	\$1,853.68	\$185,368

15. Reason for Change

There has been no change in burden since the last approval.

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 not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.