

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS
FMCS STAKEHOLDER SURVEY FOR QUALITATIVE FEEDBACK ON AGENCY
SERVICE DELIVERY
OMB NO. 3076-0017

Supporting Statement A: Justification

1. Circumstances that make 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 clients' needs, the Federal Mediation and Conciliation 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 client and stakeholder feedback in an efficient, timely manner, in accordance with our commitment to improving service delivery. The information collected from our clients 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 client 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 clients and stakeholders. It will also allow feedback to contribute directly to the improvement of program management.

2. By whom, how, and for what purpose the information is to be used.

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, quality of service delivery, efficiency of service delivery, and resolution of issues with service delivery. The Agency will assess responses to plan and inform efforts to improve or maintain the quality of services it offers to the public. If this information is not collected, vital feedback from clients 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;
- 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.

The types of collections that this generic clearance covers, include but are not limited to:

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."

- Client comment cards/complaint forms;
- Small discussion groups;
- Focus Groups of clients, potential clients, delivery partners, or other stakeholders;
- Cognitive laboratory studies, such as those used to refine questions or assess usability of a website;
- Qualitative client satisfaction surveys (e.g., post-transaction surveys; opt-out web surveys); and
- In-person observation testing (e.g., website or software usability tests).

The Agency will conduct an independent review of each information collection to ensure compliance with the terms of clearance prior to submitting each collection to OMB.

3. Consideration of the use of improved information technology.

The Agency receives surveys verbally, from interviews and discussions, or electronically through online collaboration tools. Data received verbally and electronically is simpler and faster for the Agency to process and reduce postage and handling costs. Stakeholders must supply the requested information in order for the Agency to successfully process and address stakeholder issues. If appropriate, the Agency will collect information electronically and/or use online collaboration tools to reduce burden.

4. Efforts to identify duplication.

The Stakeholder Survey for Qualitative Feedback on Agency Service Delivery is the only survey used to collect information, and no other entity collects comparable data.

5. Methods to minimize the burden to small businesses if involved.

Small businesses 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 to the Federal program if collection were conducted less frequently.

Without these types of feedback, the Agency will not have timely information to adjust its services to meet client needs and improve service provision and efficacy.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent to the guidelines.

There are no special circumstances regarding the collection of this information that would cause the information collection to be conducted in a manner inconsistent with the guidelines. It is voluntary and will not be used for statistical purposes.

8. Consultation.

The notice published in the Federal Register soliciting comments can be found at 90 FR 23529 on the *Federal Register*. One public comment was received. FMCS responded by acknowledging the comment. The Agency frequently consults with the stakeholders who complete this survey regarding the data collected through this collection activity.

9. Explain any decision to provide any payment of gift to respondents.

The Agency does not provide any payment or gift to respondents.

10. Describe any assurance of confidentiality provided to respondents.

The Agency provides respondents with no assurance of confidentiality. Personal information such as the individual's home address and home phone number is not collected.

11. Additional justification for any questions of a sensitive nature.

There are no questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

Approximately 1,213 respondents will complete both verbal and electronic surveys with the Agency each fiscal year. The annual burden of hours is an estimated 60 hours, approximately 3 minutes for each survey, completed electronically.

13. Estimates of annualized capital and start-up costs.

The Agency is leveraging existing systems and processes for this function; no meaningful additional costs will be incurred. Start-up costs were \$25,000.

14. Estimates of annualized Federal Government Costs.

The anticipated annual cost to the Federal Government is approximately \$2,400. These costs comprise staff time and use of equipment.

15. Explain the reasons for the change in burden.

When this program was launched, the Agency anticipated a greater response rate than the actual response rate. We have significantly fewer active cases due to changes made by the Administration.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

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.

17. Explain the reasons for seeking not to display the expiration date for OMB approval of the information of collection.

There is no objection to display an OMB expiration date.

18. Explain each exception to the certification statement.

There is no exception to the certification statement.