

FAQs for New Fast-Track Process for Collecting Service Delivery Feedback under the Paperwork Reduction Act

1. Why is approval from OMB/OIRA necessary?

The Paperwork Reduction Act (PRA) requires Federal Agencies to submit proposed collections of information for review and approval by the Office of Management and Budget (OMB). Under the PRA, OMB's Office of Information and Regulatory Affairs (OIRA) reviews agency information collection requests for approval, modification, or disapproval. For more information on the PRA and how it applies to information collection activities, see http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRAPrimer_04072010.pdf

2. When can I use the new Fast Track Process?

The Fast Track Process is designed for a wide range of information collections that focus on the awareness, understanding, attitudes, preferences, or experiences of customers or other stakeholders (e.g., delivery partners, co-regulators, and potential customers) relating to existing or future services, products, or communication materials. If the information meets the requirements described below and your agency has received OMB approval for a Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery ("Generic Clearance"), you may complete a short form (form can be found on HowTo.gov) and submit the collection to OIRA for approval. Within five business days of OIRA's receipt of the submission, OIRA will raise with your agency any questions, concerns, or issues that OIRA has identified with the submission. If OIRA does not respond within the 5 business days, then OIRA will notify your agency that OIRA has approved the collection, and your agency may proceed with the collection under the OMB-issued control number for the approved Generic Clearance.

3. How can I request OIRA's approval for collections that are not eligible for the Fast Track Process?

If you would like to collect service delivery information that is not covered by an OMB-approved Generic Clearance, you will have to draft the information collection instrument and then publish a *Federal Register* notice to solicit public comment (for 60 days) on the information collection. (OIRA does not have to be notified before this submission. Some agencies post draft questionnaires and then use the 60 days to refine them.) After the 60-day comment period has ended, the agency will consider the public comments that have been submitted, make any revisions to the collection that the agency believes are necessary or desirable, and will publish a 30-day *Federal Register* notice seeking public comment again

and, concurrently, will submit to OIRA the supporting statement and information collection instrument. (If you do not receive any substantive public comments during the 60-day comment period, then you may proceed promptly to publish the 30-day notice and submit the proposed collection to OIRA.) During its review, OIRA will either approve the collection as submitted, or approve the collection in part (and disapprove it in part), or disapprove the collection altogether. When OIRA approves an information collection request and assigns it an OMB control number, the agency may proceed with the collection (and shall appropriately display the control number).

Your agency may also have an existing OIRA-approved generic clearance for other purposes, or your agency may choose to develop a new generic clearance (obtaining a generic clearance eliminates the need for the agency to post separate *Federal Register* notices for each information collection that falls under the OIRA-approved generic clearance). Generic clearances are particularly useful when an agency will seek similar information collections multiple times (e.g., a series of similar surveys on the same general topic). For more information about requesting generic clearances, please see http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRA_Gen_ICRs_5-28-2010.pdf.

List of FAQ Topics Re: Fast Track Process

1. Eligibility for Service-Feedback Fast-Track Process

I. What kinds of collections are eligible for the Fast Track Process?

The Fast Track Process is designed for a wide range of information collections that focus on the awareness, understanding, attitudes, preferences, or experiences of customers or other stakeholders (e.g., delivery partners, co-regulators, potential customers) relating to existing or future services, products or communication materials. The objective of data collections eligible for the Fast Track Process is to improve existing or future service deliveries, products, or communication materials.

II. When should an agency use the Fast Track Process?

You should consider using the Fast Track Process for your data collection when the data collection meets all of the following criteria:¹

- a. The purpose of the collection is to assist the agency in improving existing or future service deliveries, products, or communication materials;
- b. Participation by respondents is voluntary;
- c. The collection does not impose a significant burden on respondents (see the further discussion below, at VI);

¹ See also OMB's previous memorandum on the Fast Track process, *available at* <http://www.whitehouse.gov/sites/default/files/omb/memoranda/2011/m11-26.pdf>.

- d. The collection does not require statistical rigor in order to have practical utility for improving existing or future service deliveries, products, or communication materials; and
- e. Public dissemination of results is not intended.

III. What types of activities are covered by the Fast Track Process?

As a general matter, the following kinds of collections fall under the Fast Track Process:

- a. Comment cards or complaint forms;
- b. Focus groups;
- c. One-time or panel discussion groups;
- d. Moderated, un-moderated, in-person, and/or remote-usability studies;
- e. Testing of a survey or other collection to refine questions;
- f. Post-transaction customer surveys (e.g., by call centers);
- g. On-line surveys; and
- h. Customer satisfaction qualitative surveys (e.g., those designed to detect early warning signs of dissatisfaction with agency service delivery).

IV. What kinds of collections are generally not eligible for the Fast Track Process?

Examples of collections that would generally not fall under the Fast Track Process are:

- (a) surveys that require statistical rigor because they will be used for making significant policy or resource allocation decisions;
- (b) collections whose results are intended to be published (see question IX below);
- (c) collections that impose significant burden on respondents or significant costs on the Government;
- (d) collections that are on potentially controversial topics or that raise issues of significant concern to other agencies;

(e) collections that are intended for the purpose of basic research and that do not directly benefit the agency's customer service delivery; and

(f) collections that will be used for program evaluation and performance measurement purposes.

V. Can we survey potential customers and other stakeholders under the Fast Track Process?

Yes. As long as the purpose is improving current or future service delivery, and the collection satisfies the criteria outlined above, agencies may collect information from other stakeholders (such as past customers, potential future customers, co-regulators, and delivery partners) in order to inform service delivery improvement. The Fast Track Process is not for the collection of information to be used for general program evaluation.

VI. How do we know if our collection is low-burden and thus eligible for the Fast Track Process?

Collections under the Fast Track Process must be low-burden for respondents based on a consideration of the total burden hours for the collection, as well as in relation to the total number of respondents and the burden-hours per respondent.

The following are illustrative examples: a fifteen minute survey for 2,000 individuals would be low-burden because the total burden hours, and the burden-hours per respondent, would be small. Two-hour focus groups, involving a total of one-hundred persons, would be low-burden because the total burden hours, and the total number of respondents, would be small. And, a five-minute comment card filled out by 10,000 people would be low-burden because the total burden hours, and the burden-hours per respondent, would be small.

VII. Can a service-related survey be eligible for the Fast Track Process even if it uses numerical scales in its answers (e.g., 1-5 scale where 1 is not satisfied and 5 is very satisfied)?

Yes. Eligible surveys can use numerical scales such as rank-order or Likert scales.

VIII. Can an agency collect personally identifiable information (PII) under the Fast Track Process?

Yes, but only in limited circumstances, such as when an agency collects contact-information PII in order to have follow-up contact with a respondent (e.g., in order to provide remuneration, when appropriate, for participants of focus groups and cognitive laboratory studies). And in those limited circumstances, the agency may collect PII (through the Fast Track Process) only to the extent that its collection is a

necessary element of the Information Collection Request. Moreover, in such circumstances, the agency must comply (as is also the case with other PII that the agency collects) with the applicable requirements, restrictions and prohibitions of the Privacy Act and other privacy and confidentiality laws that govern the agency's collection, retention, use, and/or disclosure of such PII.

IX. May an agency publish results from any information collections under the Fast Track Process?

Collections under the Fast Track Process generally should not be published. However, in some circumstances, agencies may have to make the information public. Where that occurs, agencies must communicate the qualitative nature of the results and indicate that they are not generalizable to the population of study.

X. What are the rules for payment for respondents or participants under the Fast Track Process?

Under the Fast Track Process, the same rules apply that govern payments in connection with other information collections.

XI. Is my agency eligible for the Fast Track Process? If not, how can it become so?

Most, but not all, agencies are currently eligible for the Fast Track Process. The currently-eligible agencies are:

Administrative Conference of the United States
Consumer Product Safety Commission
Corporation for National and Community Service
Department of Agriculture
Department of Commerce
Department of Defense
Department of Education
Department of Energy
Department of Health and Human Services
Department of Homeland Security
Department of Housing and Urban Development
Department of Interior
Department of Justice
Department of Labor
Department of State
Department of Transportation
Department of Treasury
Department of Veterans Affairs
Environmental Protection Agency
Equal Employment Opportunity Commission
Export-Import Bank of the United States

Federal Communications Commission
Federal Deposit Insurance Corporation
Federal Energy Regulatory Commission
Federal Trade Commission
General Services Administration
Institute of Museum and Library Services
Merit Systems Protection Board
National Aeronautics and Space Administration
National Credit Union Administration
National Endowment for the Arts
National Endowment for the Humanities
National Science Foundation
Nuclear Regulatory Commission
Office of Personnel Management
Office of the Comptroller of the Currency
Overseas Private Investment Corporation
Peace Corps
Pension Benefit Guaranty Corporation
Railroad Retirement Board
Securities and Exchange Commission
Small Businesses Administration
Social Security Administration
Surface Transportation Board
Tennessee Valley Authority
Access Board
Election Assistance Commission
International Trade Commission
United States Agency for International Development

If your agency is not on the above list, it is because the agency did not opt to join the initial government-wide *Federal Register* notice. If that is the case, you may ask your agency's PRA official to create a Fast Track Process for you, but the agency must go through the 60- and 30-day *Federal Register* notice process before you can take advantage of it. OMB has developed *Federal Register* templates for agencies to use. We encourage the PRA official to contact their OIRA desk officer to learn more about setting up the Fast Track Process.

2. Submission of Collection under the Fast-Track Process

I. How do I submit a collection under the Fast Track Process?

- a. If your agency participated in the government-wide *Federal Register* 60-day notice, published its own separate 30-day *Federal Register* notice, and has obtained approval for its "Generic Clearance for the Collection of Qualitative Feedback on Agency Service Delivery," you can use the Fast Track Process. You

will need to complete and submit a submission form with each collection request. The submission form and instructions are available at [HowTo.gov](https://www.reginfo.gov).

- b. The submission form requires you to provide summary information, including a short description of the purpose and use of the information, an estimate of the burden, information about the respondents, and a copy of the questions that will be asked in the form or format that they will be asked (e.g., if you are asking questions using a web-based application, the screen shots must be provided; if you are conducting a focus group, the script for the focus group facilitator must be provided).
- c. After you have completed the form, the request for approval will be submitted to OMB by your agency, through its existing processes for submitting requests to OMB.
- d. You can submit one collection at a time or you can bundle multiple eligible collections together. Initially, if your agency chooses to bundle multiple collections together, it must not exceed five at a time, and they should be similar in nature (e.g. five comment cards at once). If you find that you have many collections and this approach will not work for you, you should contact your OIRA desk officer to discuss possible solutions.

II. Can I submit more than one request at the same time?

The Generic Clearance was developed with a quick approval turnaround to reduce the need to submit multiple requests (e.g., multiple focus groups or surveys) at the same time. If you find that there is a need to submit more than one request at the same time, you should discuss the issue with your desk officer. As a general guide, we plan to limit the number of requests that can be bundled to five in the first six months of approval. We ask that in bundling you consider the complexity of the request and limit the bundling to similar activities (e.g., a bundle request for focus groups). Each request within the bundle must be accompanied by a separate submission form to facilitate separate processing of the bundle elements.

III. What if I don't hear back within five business days of OMB's receipt of the submission?

If OMB does not have concerns about the collection, you will receive notice that the collection is approved after five business days automatically. You can also visit www.reginfo.gov to check on the status of your submission.

IV. What should I do if my submission for fast-track request is returned as improperly submitted or as outside scope of the generic clearance?

If your request is returned as improperly submitted, it means that you have not provided all the required information, you have not filled out the form correctly,

or your submission is otherwise incomplete. If it is unclear why you improperly submitted, you should ask your desk officer what needs to be done for resubmission. If OIRA returns a collection as outside the scope of the generic collection, the collection will not be approved. You should discuss with your desk officer why it was outside the scope of the generic approval.

3. Relation of Fast Track Process to Other PRA Processes

I. May an agency keep using its existing generic clearance?

Yes. The Fast Track Process is an additional tool that does not affect agencies' ability to use existing generic clearances or create new ones.

II. If an agency has an existing generic clearance relating to service delivery that takes longer than the new Fast Track, may it migrate the existing generic clearance package into the Fast Track Process?

The agency has two options. First, it can just start using the new Fast Track Process. Second, if the scope and conditions of your generic are similar to the Fast Track, you may request that it be changed so that, like the Fast Track Process, approval will be automatically granted within five business days from receipt unless OMB raises concerns.

Requests to convert existing generics should be submitted to your OIRA desk officer (with a cc to Margaret Malanoski, MMalanoski@omb.eop.gov). OIRA will notify you within 15 business days if the collection can be converted without revising the collection and requesting public comment as required by the PRA.

III. If an agency has an existing generic clearance, may it concurrently submit the same information collection requests under this clearance and through the Fast Track Process?

No, you should submit information collection requests under only one process. If you are not sure which way to submit a collection request, we encourage you to ask your desk officer.