Procedures for Obtaining OMB Clearance to Conduct a Survey

The Paperwork Reduction Act (PRA) of 1995 requires that each federal agency obtain approval from the Office of Management and Budget (OMB) before undertaking to collect information from ten or more persons, or continuing a collection for which the OMB approval and the OMB control number are about to expire. The approval process, which is popularly known as the "OMB clearance process," is extensive and time-consuming. It requires two Federal Register notices and a detailed application to OMB. The duration for the entire process can exceed six months.

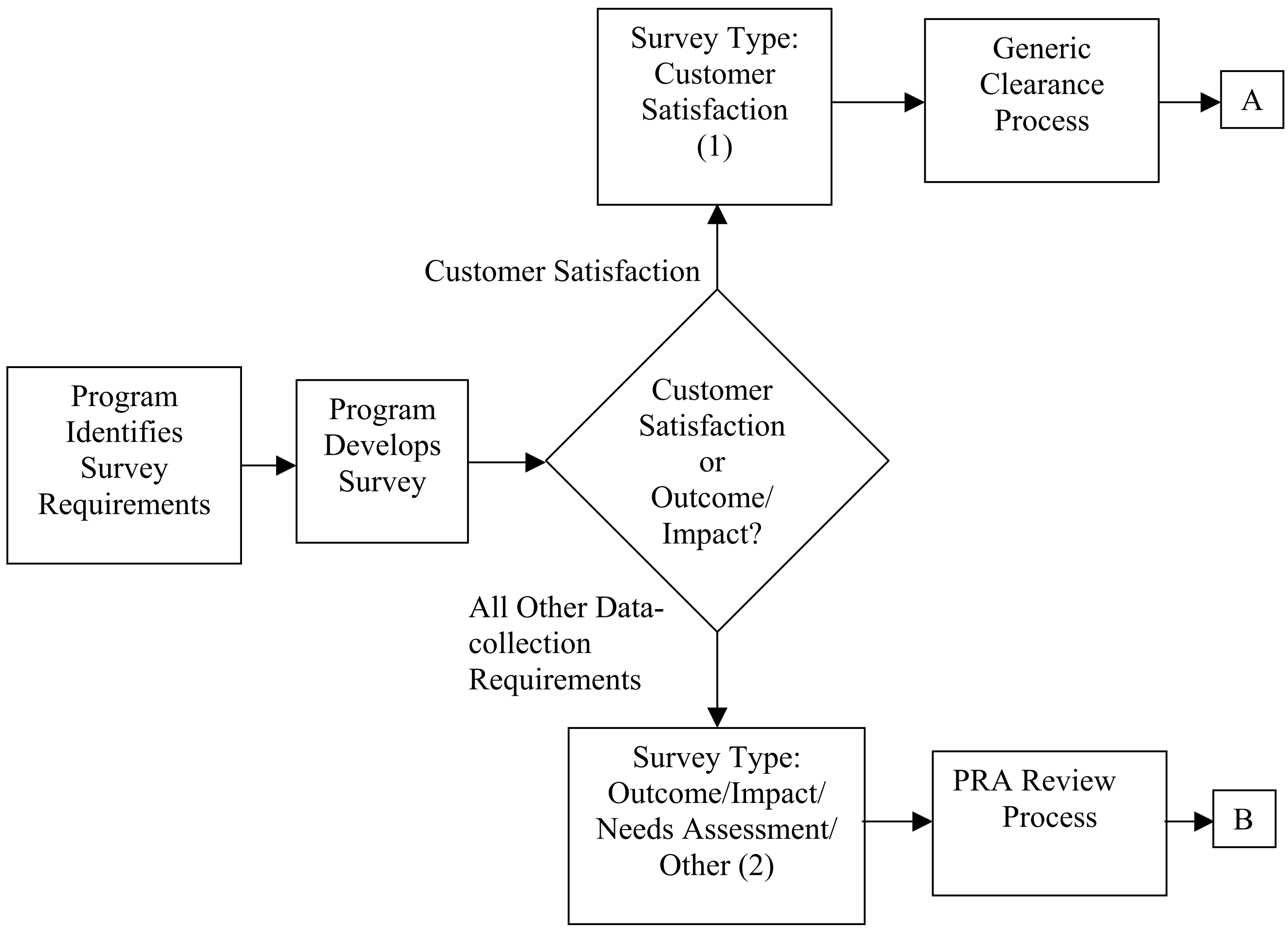
At present, only three exceptions exist to this lengthy process and only one of these has relevance for general evaluations. The three exceptions are (1) surveys of Federal Government employees on subjects concerning their employment, (2) emergency reviews when a data-collection activity must be performed to meet an unanticipated, urgent need and no time is available for public comment, and (3) customer-satisfaction surveys. The first of these requires no OMB clearance. The second two require much-abbreviated processes, but of these, only the last is relevant to evaluation surveys. The last is relevant to process-evaluation surveys and is known as a "generic clearance process." Within the Department of Energy (DOE), it is sometimes called the "DOE–887 Process." The full OMB Clearance process is sometimes called the "PRA Review Process;" this appendix uses that term for the full process.

DOE's Office of the Chief Information Officer (OCIO) has issued a *Reference Guide for Submitting DOE Information Collections for OMB Review and Approval* (April 2004) (*Reference Guide*) for program managers who must collect data from the public. This 42-page document is an excellent summary of the OMB clearance requirements, including the generic clearance process requirements, and can be downloaded from: http://cio.doe.gov/RBManagement/Records/PRA_Information.html.

This appendix uses two flow charts (Generic Clearance Process and PRA Review Process) adapted from the *Reference Guide* to provide a visual image of the OMB clearance process. The flow charts show the basic decision points for selecting the appropriate clearance process and the steps for obtaining clearances under the two processes. The flow charts are based on information from the *Reference Guide* and other sources and assume data-collection from the public. The charts should be used in conjunction with the detailed guidance and contact information contained in the *Reference Guide*.

In the OMB-review flow charts that follow, each step (box) is numbered. For some of the steps, additional information about the step is provided in similarly numbered, double-bordered boxes below the step's box. Because the PRA Review Process has many steps, an overview flowchart showing all of the steps precedes the flow charts with this additional information. This overview flowchart serves as a map to the steps of the PRA Review Process.

Determining Which OMB Clearance Process to Use



(1) Customer Satisfaction: Obtain information from users of EERE program outputs regarding their experience with the program and satisfaction with its products and services.

(2) Outcome/Impact/Needs Assessment/Other: Collect data for the purposes of quantifying achievements of program outputs and outcomes; assessing the proportion of outcomes that can be attributed to the program instead of other influences; estimating the needs of prospective markets that the program can meet with improvements to its design (exclusive of satisfying the needs of existing markets with the program in its current form).

The Generic Clearance Process

A → **1** Program Contacts EIA for Guidance → **2** Program/EIA Prepare DOE-887 Submission to OMB → **3** EIA Submits Request to OMB → **4** Program Receives Notification to Proceed from EIA

1

Contact EIA at 202-287-1717 for details.

4

OMB has 10-day window to disapprove or suggest changes. If OMB does not reply within this period, the clearance is approved.

2

Items to include in a letter to OMB requesting generic clearance:

- Identify organization(s) that will be using the clearance
- Reference generic clearance agreement DOE-887 "DOE Customer Surveys"
- Reference 10-day time limit for OMB disapproval
- Make commitment to provide survey results to OMB

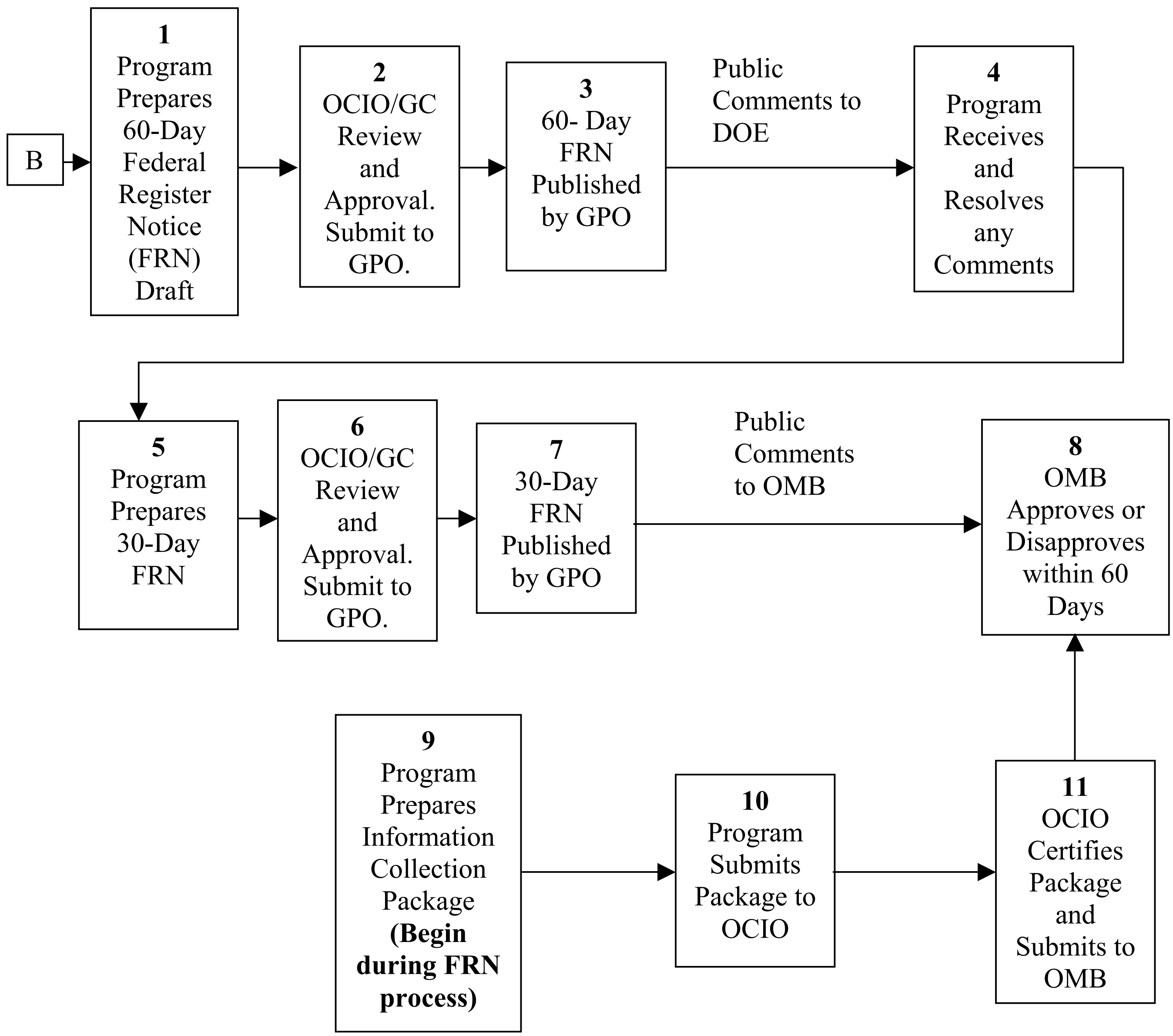
Include following information about the survey:

- Function(s) and objective(s) of requesting organization(s)
- Reasons for developing survey
- How survey responses will be used (e.g., improved program delivery)
- Description of survey respondents (what population will be surveyed?)
- Survey distribution and response collection method
- Estimate of response rate/number of respondents
- Participation factors (type of respondent, voluntary participation, data confidentiality)
- Estimate of time burden for responding for a single respondent and the total estimated burden (single response time x estimated number of responses)

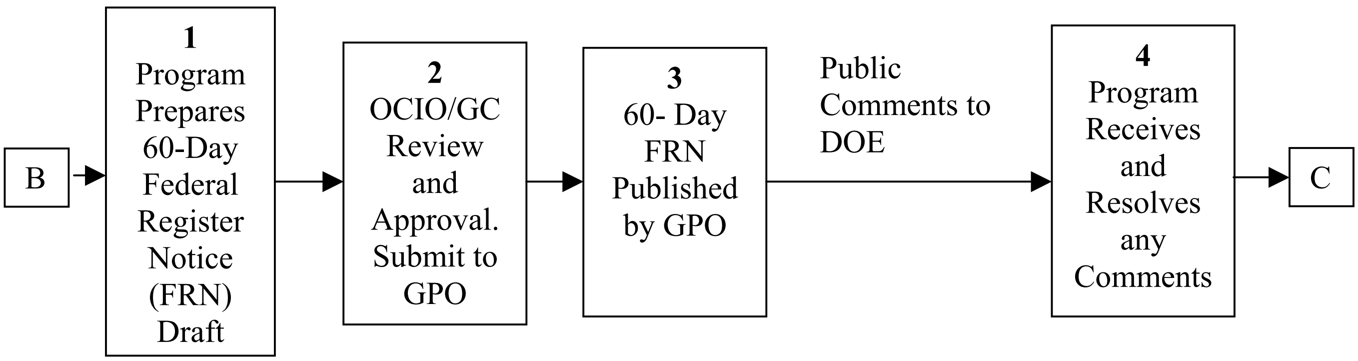
An example of a letter to OMB requesting generic clearance that has been successfully used by DOE begins on page 8 of this appendix.

The PRA Review Process – Overview

(The following three pages provide additional information on the requirements of the PRA Review Process)



The PRA Review Process – Additional Information (1)



2

Send FRN to OCIO Records Management Division. OCIO will handle GC review and submission to GPO.

4

If comments are received during the 60-day public comment period, they must be evaluated and responses must be prepared. A summary of the public comments, including those actions taken in response to the comments, must be included in the information collection package (see Box 9 on the final page of this PRA Review Process flow chart). This is particularly applicable where the proposed information collection was amended or refined based on the public comments.

1

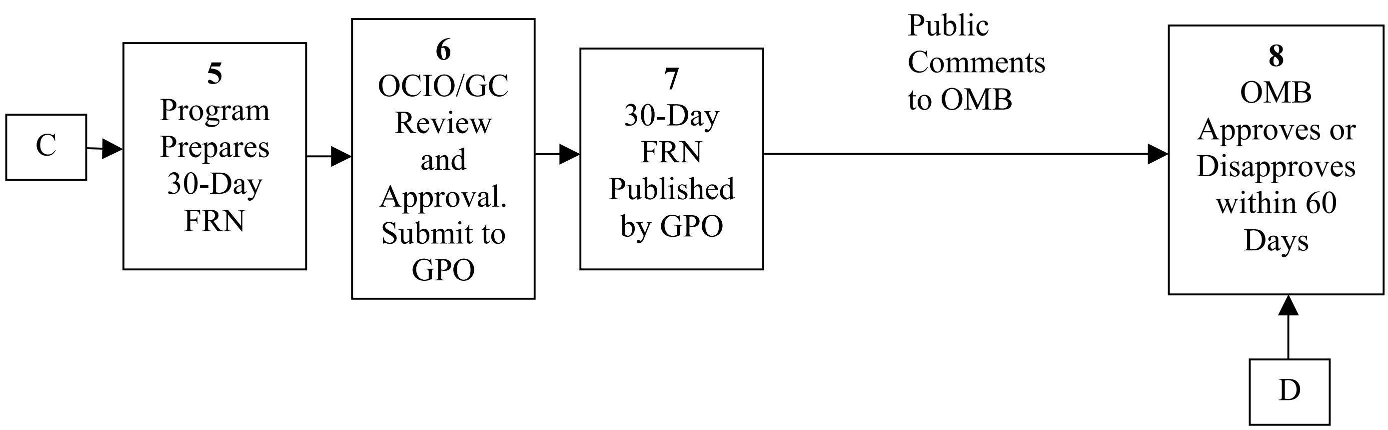
The FRN for the collection should include the following information:

- A statement that DOE is proposing an information collection to OMB.
- The title of the information collection.
- A summary of the information collection.
- A brief description of the need for the information and its proposed use
- A description of the likely respondents and proposed frequency of response
- A summary of the privacy risks involved in collecting the information electronically from potential respondents (if appropriate)
- An estimate of the total annual reporting and record keeping burden
- Direction that comments should be submitted to DOE (see below).

The FRN should indicate that public comments and requests for information, including copies of the proposed information collection and supporting documentation, should be submitted to DOE within 60 days of the date of publication in the Federal Register. The notice should indicate that comments must be sent to the sponsoring program office along with a copy to:

Director, Records Management Division, IM-11
Office of the Chief Information Officer
Germantown Bldg., US Department of Energy,
Washington, DC, 20585-1290

The PRA Review Process – Additional Information (2)



5

After the 60-day FRN has been published in the *Federal Register* and appropriate action has been taken to address any public comments received, a 30-day FRN must be prepared to notify the public that the information collection is being submitted to OMB for review and approval.

The 30-day FRN should include the following information:

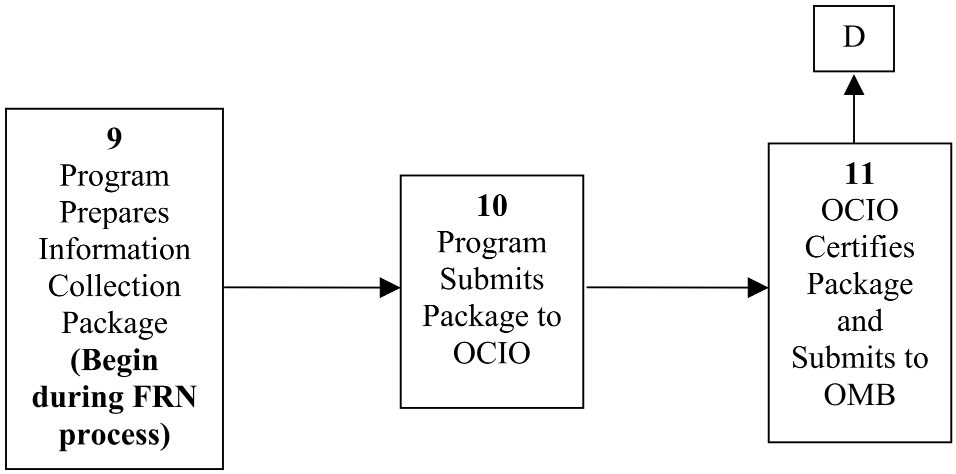
- A statement that OMB approval is being sought
- The title of the information collection
- A summary of the information collection
- A brief description of the need for the information and its proposed use
- A description of the likely respondents and proposed frequency of response
- An estimate of the total annual reporting and record keeping burden
- Indication that comments be submitted to OMB
- Statutory authority for collecting the information

The complete information package (see Box 9 of this PRA Review Process) should be submitted to the OCIO along with the 30-day FRN

6

Send FRN to OCIO Records Management Division. OCIO will handle GC review and submission to GPO.

The PRA Review Process – Additional Information (3)



9

The information collection package consists of the following documents:

- OMB Form 83-I, "Paperwork Reduction Act Submission"
- Form 83-I **Supporting Statement**
- Draft information collection tools/instruments (e.g., forms and accompanying instructions, copy of the citation from the governing regulation)
- Summary of public comments received
- Supporting documentation:
  - Copy of the signed 30-day FRN
  - Updated list (in table format) of packages contained in the collection (see Attachment VI of the *Reference Guide*)
  - Copy OR summary of the PIA (if appropriate) See p.19 of the *Reference Guide*
  - Other documentation deemed necessary by OMB

The **Supporting Statement** documents that the certification requirements contained in OMB Form 83-1 have been met. See pp. 18-19 and Attachment V in the *Reference Guide* for additional information.

OMB Form 83-I requires certification that the proposed collection of information:

- Is necessary for the sponsoring program office to perform its functions.
- Avoids unnecessary duplication.
- Reduces the burden on the respondents.
- Uses plain, coherent, and unambiguous terminology.
- Will be consistent and compatible with current reporting and record-keeping practices.
- Indicates the retention period for record-keeping requirements.
- Informs respondents about:
  - Why the information is being collected
  - How the information will be collected
  - How the information will be used
  - The extent of the estimated labor and cost burden to respond
  - The nature of response expected (voluntary, required, or mandatory
  - The level of confidentiality to be imposed
  - The requirement that a valid OMB control number must be displayed
- Was developed by an office that has planned and allocated resources for managing the information to be collected.
- Uses statistical survey methodology.
- Uses information technology to reduce burden.

EXAMPLE OF A GENERIC REQUEST LETTER USED BY DOE

Mr. xx
Department of Energy Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC 20503

SUBJECT: USE OF GENERIC CLEARANCE FOR THE REGIONAL OFFICES OF THE OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY (EERE) CUSTOMER FEEDBACK SURVEY

Dear Mr. xx:

The six Regional Offices of the U.S. Department of Energy (DOE), Office of Energy Efficiency and Renewable Energy (EERE) plan to use the Office of Management and Budget (OMB) approved generic clearance, DOE-887, "DOE Customer Surveys" (OMB No. 1901-0302, expiring September 30, 2005) to survey stakeholders, partners and customers of the Regional Offices and EERE. If we do not hear that you disapprove of this request within the next ten days, as agreed to upon your approval of DOE-887, we will notify the six Regional Offices that they have authority to conduct this survey. We will provide OMB with the results of this data collection when we submit the annual report of surveys conducted under the generic clearance.

The six Regional Offices (located in Atlanta, Boston, Chicago, Denver, Philadelphia, and Seattle) of EERE are the Federal Government's principal mechanism for delivering energy efficiency and renewable energy programs at the regional, state, and local levels. For most energy users, the Regional Offices are the gateway into EERE's portfolio of technical and financial resources, designed to increase the use of efficient energy and clean power technologies in buildings, industry, transportation, power generation, and Federal facilities.

The Regional Offices have developed the attached subscriber survey in response to Executive Order 12862, "Setting Customer Service Standards." The responses to the proposed questions will be used as input for improving the delivery of EERE programs to States and local governments, communities, private businesses, non-profit organizations, colleges and universities, and other customers. The respondents of this survey will consist primarily of State government officials and other customers of the Regional Offices.

The survey will be distributed via e-mail to key partners and stakeholders in the six EERE regions from each of the six Regional Office Directors. The responses are also expected to be collected via e-mail. The key partners and stakeholders will be selected by each of the Regional Office Directors, with input from their staff. Given the interest of the partners and stakeholders in the performance of the Regional Offices and past experience, the response rate is expected to be at least 50% of the approximately 240 total partners and stakeholders receiving the survey. The intent of the survey is to obtain qualitative and quantitative information that will be useful for making improvements in the performance of the Regional Offices in delivering programs to State partners, stakeholders, and other customers. The survey results

will reflect the opinions of those partners and stakeholders who choose to participate. Participation will be voluntary, and data will be confidential.
The attached survey will take approximately 15-20 minutes to answer, and contains 5 questions. The total burden for all the respondents should not exceed 40 hours (120 respondents x 20 minutes).

yy is the point-of-contact for the survey and may be contacted at zz. Other questions should be directed to aa on bb.

Sincerely,

xx
Director
Statistics and Methods Group
Energy Information Administration

Enclosure – Customer Feedback Survey