

2133-0528

SUPPORTING STATEMENT 2006

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION UNDER 5 CFR PART 1320
INFORMATION COLLECTION: 2133-0528**

Justification

1. Explain the circumstances that make the collections 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.

Executive Order 12862 requires, among other things, that agencies survey customers to: (1) determine the kind and quality of services that they want, and (2) determine their level of satisfaction with existing services. In addition, the E.O. requires agencies to provide customer service equal to the best in business. Accordingly, we must determine what the best in business is for our activities.

This information collection satisfies DOT Organizational Excellence goal.

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 survey instruments covered by this information collection are of three general types:

The first is a single page Customer Service Questionnaire (Form MA-1016) used to obtain prompt customer feedback on the quality of a specific service/product at the time it is provided to the customer by the Maritime Administration (MARAD). This survey will accompany the service/product at the time it is provided and will ascertain the customer's level of satisfaction. The survey will be folded and returned to MARAD via the business reply mail information printed on the back of the instrument.

The second is a multi-page form and broader in scope, in terms of time and the services/products covered. This Program Performance Survey (Form MA-1017) is mailed annually to customers for their views on MARAD's major programs and activities with which the customers were involved during the preceding year. The information collected will be used by: (1) MARAD's senior management to monitor overall customer satisfaction levels, and (2) MARAD's program managers to identify areas for improvement in their programs' service or product delivery and to clarify communications to customers on what they may expect. The survey will be folded and returned to MARAD via business reply mail information printed on the back of the instrument.

The third is a single page Conference/Exhibit Survey (Form MA-1021) that will be used to obtain prompt responses from attendees at MARAD-sponsored conferences, exhibits, and other maritime industry events. MARAD officials use this instrument to monitor customer satisfaction and to identify areas for improvement.

The fourth is also a multi-page form and broader in scope, in terms the quality of services provided in connection with the academic, graduate and postgraduate programs. This U.S. Merchant Marine Academy (USMMA) Program Performance Survey (Form MA-1038) was specifically designed to be used by the USMMA only. The survey will be used on a continuous three-year cycle. The

information collected will be used by: (1) USMMA's superintendent (2) senior management officials and (3) department chairs to monitor overall customer satisfaction levels and the USMMA's program managers to identify areas for improvement in their programs' service or product delivery and to clarify communications to customers on what they may expect. The survey will be folded and returned to MARAD via business reply mail information printed on the back of the instrument.

E.O. 12862 requires agencies to report findings on customer service standard satisfaction, including strategies/timetables for fixing problem areas, annually to internal and external customers. Information collected from these forms is used to prepare MARAD's Annual Customer Satisfaction Report. This report is available in hard copy and on MARAD's web site.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology. Also describe any consideration of using information technology to reduce burden.

MARAD provides a total electronic option for this collection. The opening paragraph on all four forms indicates they may be returned to MARAD by fax (number given) or customer may respond through MARAD's Home Page (<http://www.marad.dot.gov>). This has permitted the respondents to submit their views electronically. Forms and instructions are also available for download from MARAD's Home Page.

Options in terms of developing and implementing an automated system which consolidates responses to the surveys is under consideration.

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.

There are no known duplications of this information collection. The programs and activities to be surveyed are limited to MARAD and MARAD does not otherwise collect customer satisfaction information on these subjects.

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

The collection instruments have been developed to make responding as simple and least time consuming as feasible for all respondents. The option to use either the electronic or paper response medium simplifies responses. In addition, as much as possible, we have used check-off response mechanisms in the survey instruments.

6. Describe the consequence 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 the burden.

These surveys are essential to MARAD's compliance with E.O. 12862. Without such information collections, MARAD would be unable to accurately identify customers' views of the services/products they received. Without these views, potential needs for improvement in the services/products may go unidentified and thus unrealized.

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 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 that 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 which unnecessarily impedes sharing data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, 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 information collections will not be collected in any manner described above, except for requiring a response in less than 30 days. We ask for responses within two weeks to maximize response rates. The survey instruments are simple and will not require much time for completion. If promptly completed and returned to MARAD, the likelihood of responding is increased. Allowing 30 days to make this voluntary response increases the chance for the instrument to be misplaced, lost, or whatever, resulting in no response and a lower overall response rate.

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 instructions 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 three 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.

The Maritime Administration published a 60-day notice and request for comments on this revised information collection in the Federal Register (71 FR 28414, May 16, 2006, copy attached) indicating comments should be submitted on or before July 17, 2006. No comments were received.

During FY 1999, nine potential respondents were consulted for their comments via a pretest of the survey instruments. Their responses were considered in the final instruments attached to this submission.

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

No payments or gifts are made to respondents for their participation in these surveys.

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

No assurance of confidentiality is expected or given as the instrument will be conducted as an anonymous survey and will not be coded in any way to track individual respondents. This information collection will be used only for the purpose of assessing and improving MARAD's performance and services.

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. This 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 are no questions of a sensitive nature.

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 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 burdens in item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for 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.

<u>Number of Respondents</u>	<u>Responses Per Respondent</u>	<u>Total Responses Annually</u>	<u>Hours Per Response</u>	<u>Total Hours Annually</u>
------------------------------	---------------------------------	---------------------------------	---------------------------	-----------------------------

Program Performance Survey (Annual):

$$800(\text{avg.}) \times 1 = 800 \times 0.10 = 80$$

<u>Number of Respondents</u>	<u>Responses Per Respondent</u>	<u>Total Responses Annually</u>	<u>Hours Per Response</u>	<u>Total Hours Annually</u>
------------------------------	---------------------------------	---------------------------------	---------------------------	-----------------------------

Transaction Surveys: Customer Service Questionnaire & Conference / Exhibit Survey

$$5850 \times 1 = 5850 \times 0.03 = \frac{176}{256}$$

Total Burden Hours: 256

Annualized Cost of Burden = \$4,250:

Program Performance Survey

800 responses x 0.1 hour = 80 hours @ \$16.60 = \$1,328

Customer Service Questionnaire & Conference / Exhibit Survey

5850 responses x 0.03 hour = 176 hours @ \$16.60 = \$2,922

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 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 purchasing or 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.

The estimated annual cost burden to respondents per response is as follows:

(a) Total Capital and Start-Up Costs Estimate: There are no capital or start-up costs associated with this information collection.

(b) Total Operation and Maintenance and Purchase of Services Estimate: There are no operation or maintenance costs associated with this information collection.

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 total annual cost to the Federal Government for processing the collection is estimated as follows:

One-time Costs: \$ None.

Annual Costs: \$27,759

Program Performance Survey (Annual) Costs = \$10,613

Prepare 800 for mailing x 1 min. = 13.3 hours @ \$12.58 per hour	= \$	167
800 per year to log out x 1 minute = 13.3 hours @ \$12.58 per hour	= \$	167
800 per year to evaluate x 0.5 hour = 400 hours @ \$24.81 per hour	= \$	9,924
Postage 800 x 1.2(mail & return) x \$0.37	= \$	355
Sub Total	= \$	10,613

Customer Service Questionnaire & Conference / Exhibit Survey Costs = \$17,146:

Prepare 5850 for distribution x 1 min. = 97.5 hours @ \$12.58 per hour	= \$	1,227
5850 per year to log out x 1 minute = 97.5 hours @ \$12.58 per hour	= \$	1,227
5850 per year to evaluate x 5 min. = 487.5 hours @ \$24.81 per hour	= \$	12,095
Postage 5850 x 1.2 (distribution & return) x \$0.37	= \$	2,597
Sub Total	= \$	17,146

Total Annual Costs to the Government: \$27,759

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB Form 83-I.

Although no program changes or adjustments are being reported in items 13 or 14 of the OMB Form 83-I, this information collection is being submitted as a revision/modification to the currently approved version by including the new "Conference/Exhibit Survey," Form MA-1021. It is estimated that this new survey instrument will not change the current burden estimate of 256 hours and cost estimate of \$0.00.

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

MARAD plans to publish the results of all three survey instruments in the end of the fiscal year annual report. The Program Performance Survey instrument will be mailed out to customers during

the month of March and results will be analyzed between April - June. It is planned that the annual report will be published by the end of September.

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

Not applicable, the expiration date for OMB approval will be given.

18. Explain each exception to the certification statement identified in Item 19, "Certification For Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement in Item 19.

B. Collection of Information Employing Statistical Methods

1. Universe and Respondent Selection

The Program Performance Survey will be forwarded to participants from the current MARAD customer database. This database includes shipbuilders, ship owners, ship operators, financial institutions, freight forwarders, exporters, contractors, brokers, government agencies, etc.

MARAD will conduct its Program Performance Surveys in three-year cycles, e.g., the next cycle will cover years 2006, 2007, and 2008. The methodology used will consist of a 100 percent census of approximately 1,500 customers who participate in at least one of MARAD's major program areas. Six programs with a total population of approximately 600 customers are targeted for the year 2006; five programs with a total population of approximately 350 customers are targeted for the year 2007; five programs with a total population of approximately 550 customers are targeted for census during 2008.

The universe for the Customer Service Questionnaire (CSQ) and the Conference/Exhibit Survey can not be accurately determined at this time. However, it is estimated that a total of 5,850 participants from the entities listed above as well as other entities that conduct business with MARAD represent the universe for both surveys as accurately as possible. The survey questionnaire will be distributed to parties who received services or products during one randomly selected week in October and April each year. On the selected week, all managers in MARAD headquarters and field organizations will send a questionnaire with each product or service provided to a customer each day. The Conference/Exhibit Survey will be provided to attendees at the conclusion of a MARAD sponsored conference, exhibit, or other industry-related event.

2. Procedures for Collecting Information

Respective program offices are responsible for developing and submitting their customer mailing list to MARAD's Customer Service Coordinator by January 30 each year. In March, we will send a cover letter, a Program Performance Survey form, and instructions directly to the participant asking him or her to answer the survey questions and to return the completed form to MARAD. The reference period will be the preceding year for each survey. The Customer Satisfaction Representative (Representative) for the Maritime Administration will be responsible for the distribution of all Program Performance Survey forms. All completed forms will be returned to the Representative. The Representative will maintain a tracking system for the forms and disseminate responses to the

appropriate Associate Administrator or Independent Office Director for analysis. This will allow each responsible management official an opportunity to review the survey results and to address any issues identified by the customers. By June 30th, all survey documents are to be submitted to the Customer Service Committee for overall analysis and preparation of the required annual customer service reports.

The survey results will be compiled and used for monitoring overall MARAD performance and for future performance planning purposes. The results of the surveys and any interventions to address appropriate issues identified by the surveys will be incorporated into MARAD's Performance Plan for the upcoming fiscal year.

Last, the Conference / Exhibit survey will be conducted in accordance with scheduled MARAD conferences and events.

3. Methods to Maximize Response

MARAD will make all survey forms user friendly in an effort to maximize candid opinions from our respondents. One week after forwarding the initial letter, a reminder stressing the importance of completing and returning the form to MARAD will be sent to all addressees of the initial letter.

4. Testing of Procedures

During Fiscal Year 1999, MARAD pre-tested the instruments with five potential Program Performance Evaluation respondents and four Customer Service Questionnaire respondents. We requested their comments on the proposed survey/questionnaire instruments and procedures. Their comments have been incorporated as appropriate.

5. Contacts for Statistical Aspect and Data Collection

James J. Zok
Maritime Administration
202/366-0364
jim.zok@dot.gov

ATTACHMENTS

1. Forms MA-1016, MA-1017, MA1021, MA-1038
2. 60-Day Federal Register Notice dated May 16, 2006
3. 30-Day Federal Register Notice dated August 8, 2006
4. Reference – Executive Order 12862 DATED SEPTEMBER 11, 1993