

SUPPORTING STATEMENT

Rural Development Operations and Management – Faith-Based and Community Initiatives-
Non-Profit Customer Voluntary Survey on the Equal Treatment Rule

A. Justification

1. Explain the circumstances that make the collection of information necessary.

The Faith-Based and Community Initiatives (FBCI) was implemented in the Department of Agriculture by Executive Order 13280-Responsibilities of the Department of Agriculture and the Agency for International Development With Respect to Faith-Based and Community Initiatives, December 12, 2002. FBCI Reporting and Outreach began in Rural Development in 2004. Now that we are into the third year of this Presidential Initiative and to meet the long term goal of improved participant outcomes, it is time to measure customer satisfaction with Rural Development service under the Equal Treatment Rule, agency regulations, and establish compliance benchmarks. The 14 Rural Development programs under the FBCI provide insured or guaranteed loans and/or grants to eligible applicants (including non-profit entities) located in rural geographic areas to assist them in providing services to beneficiaries, low-income individuals and communities. Loan and grant applications and awards are processed through approximately 900 Field Offices. In accordance with Government Performance and Results Act (GPRA) and EO 13280, the survey will enable Rural Development to measure the implementation of and compliance with the Equal Treatment Rule, 7 CFR part 16, as well as implement action plans and measure improvements.

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.

To facilitate improved participant outcome, a long-term goal of the FBCI, and in an effort to continuously improve program services, a survey has been developed that can measure impediments that applicants may have encountered when they submitted an application. The outcome of the Voluntary Survey on the Equal Treatment Rule will provide the general satisfaction level among non-profit borrowers throughout the nation, highlight areas that need improvement, provide a benchmark for future surveys, and improvement in implementation of and compliance with the Equal Treatment Rule. The customer Equal Treatment Rule Survey is being administered as part of Rural Development's on-going customer outreach program and to ascertain agency compliance with the Equal Treatment Rule (7CFR, Part 16). The USDA Director, FBCI and Rural Development FBCI Coordinator developed the survey and Operations and Management Office, FBCI staff will mail the Equal Treatment Rule Survey to all non-profit applicants (FY 2004-2006) in the 14 programs under the Faith-Based and Community Initiatives.

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, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.

The survey will only be made available as a paper survey to be issued through the United States Postal Service. Responses can be submitted via paper or electronically through the Rural Development FBCI web site. (<http://www.rurdev.usda.gov/rd/fbci/>), where the survey will be posted.

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 is no other similar information available to measure Equal Treatment Rule implementation and compliance regarding Faith-Based and Community Organizations; therefore, no duplication of information exists.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-1), describe any methods used to minimize burden.

The collection will impact small entities, non-profits, both faith-based and secular. An initial mailing to prior years (2004-2006) applicants will be completed.

6. Describe the consequences to Federal program or policy activities if the collection is not conducted or conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The FBCI is focusing on quality of public outreach and the Equal Treatment Rule, both implementation and compliance. If we do not collect this information, we will not be able meet the performance goals established for Rural Development under the President's Management Agenda. Without this survey, we will not be able to comply with Executive Orders 13279 Equal Protection of the Laws for Faith-Based and Community Organizations, and EO 13280. Without The collection of this information, Rural Development would not know how effectively the Equal Treatment Rule is working for the customers. This information should allow Rural Development to judge the effectiveness of the program and provide ideas for improvement.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information more than quarterly. Respondents will only need to report information on a one-time basis.

b. Requiring written responses in less than 30 days. Based on previous experience with surveys, the Department has found that if you give customers 30 days to respond to a survey, they are more likely to postpone their response and ultimately forget to answer the survey. A request of a 2-week response usually motivates the customer to respond more quickly and improves the overall response rate.

c. Requiring more than an original and two copies. Only the original survey needs to be completed and returned to Rural Development.

d. Requiring respondents to retain records for more than 3 years. The survey does not require the respondents to retain information.

e. Not designed to produce valid and reliable results. Not applicable, answers are yes and no.

g. Requiring use of statistical data classification, which has not been reviewed and approved by OMB. We are not using statistical classification which has not been reviewed and approved.

f. Requiring a pledge of confidentiality. The Privacy Act does not pertain to organizations.

Information collected will be shared within Rural Development.

h. Requiring submission of proprietary trade secrets. We are not requiring submission of proprietary trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. 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 recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

A notice was published in the Federal Register on November 20, 2006 [Vol 71, No. 223]. No comments were received.

Faith-based and Community-based organizations were consulted at the White House Office Faith-Based and Community Initiatives Conference in Denver, Colorado, Sept. 25-26, 2006, to obtain views on availability of data, frequency of collections, clarity of instructions and recordkeeping, reporting format, completion of survey, etc. A list of organizations that participated and contact information are:

Center for Disabilities
1304 Berkley Avenue
Pueblo, CO 81004
Larry Williams 719-546-1271

New Start
1454 Syracuse Street
Denver, CO 80220
Dean Goden 720-329-8565

Grace Fellowship/Reconciliation Ministries
1201 North College Avenue
Ft. Collins, CO 80504
Joanie Riggles 970-545-0744

Water's Edge

2281 WCR #10
Erie, CO 80516
Amber Clay 303-828-4302

Good Faith Housing Corp.
3100 Ames Road
Lancaster, TX 75116
Pastor Moxey 214-232-0220

Open Bible Medical Clinic
824 South union Blvd.
Colorado Springs, CO 80910
Twilia Johnson 719-475-0972

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

Customers will not receive a payment, gift or incentive to respond.

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

Rural Development will tabulate the completed surveys and provide results to USDA. The Privacy Act does not apply to organizations, as this survey is directed to non-profit entity applicants; no Privacy Act assurance is required.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

There are questions of a sensitive nature on the survey but the questions are directed to the organization applying not individuals. Questions 9 and 10 of the survey deal with hiring practices based on religious affiliation and the display of religious symbols. The questions are based on regulatory requirements in 7 CFR, Part 16-Equal Treatment of Religious Organizations

12. Provide estimates of the hour burden of the collection of information.

The Rural Development Voluntary Survey on the Equal Treatment Rule will be sent to approximately 4,000 organizations and is estimated to take 5 minutes per response, for an estimated total of 320 annual hours, and an estimated total cost to the public of \$10,954. See attachment for breakdown of how burden was estimated. We are seeking a 3 year approval in order to send the survey out.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information

There are no capital and start-up costs or operation and maintenance costs.

14. Provide estimates of annualized cost to the Federal Government.

The estimated cost to the Federal Government for each survey is referenced below. A more detailed breakout is included as Attachment A.

Administrative Costs:	\$ 815.00
Analysis:	\$ 815.00
Labor (Processing)	\$ 5,215.20
Postage:	\$ 3,120.00
Printing:	\$ <u>1,500.00</u>

Total Cost to Government: \$11,466.00
(\$2.87 per survey @ 4,000)

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

This is a new information collection.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

Not applicable, results will not be published.

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

The agency will display the OMB expiration date on the survey associated with this information collection.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-I.

There are no exceptions noted.

19. How is this information collection related to the Service Center Initiative (SCI)? Will the information collection be part of the one stop shopping concept?

Not applicable