

Date: May 9, 2007

**Supporting Statement for
Paperwork Reduction Act Submissions**

**Title: Federal Emergency Management Agency Housing Inspection
Services Customer Satisfaction Survey**

OMB Control Number: 1660-NW31

Form Number: FEMA Form 86-26 (MW), SEP 04

Headnote: The proposed information collection (IC), Housing Inspection Services Customer Satisfaction Survey, is currently bundled with other customer satisfaction surveys under OMB control number 1660-0036, named 'Housing Inspection Survey'. The survey has been separated from the bundle after the consultation with the OMB desk officers, and is presented here as a new IC request.

Specific Instructions

A. Justification

1. Explain the circumstances that make the collection of information necessary (give details as to why this information is being collected). 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. Provide a detailed description of the nature and source of the information to be collected.

The proposed IC is a Time-Constraint survey.

Executive Order 12862 [<http://govinfo.library.unt.edu/npr/library/direct/orders/2222.html>] signed on 9/11/1993 requires all executive departments and agencies that provide significant services directly to the public shall provide those services in a manner that seeks to meet the customer service standard established herein and shall take the following actions:

- Identify the customers who are, or should be served by the agency
- Survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services
- Post service standards and measure results against them
- Benchmark customer service performance against the best in business
- Survey front-line employees on barriers to, and ideas for, matching the best in business

- Provide customers with choices in both the sources of service and the means of delivery
- Make information, services, and complaint systems easily accessible
- Provide means to address customer complaints

In compliance with the FEMA Housing Inspection Services contract inspectors meet with applicants in designated federally declared disasters areas to verify personal information and assess dwelling damage. FEMA has contracted with J&E Associates in Silver Spring, MD to distribute, collect, and analyze post inspection customer service surveys to be completed by the applicants in order to comply with executive order 12862.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA Inspection Services Managers and Task Monitors use the survey results to measure disaster inspector customer service; and generally gauge and make improvements to disaster services that increase customer satisfaction and program effectiveness. The information is shared with Regional staff specific to the federal declaration for which the survey is conducted.

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. Also describe any consideration of using information technology to reduce burden.

To comply with Government Paperwork Elimination Act (GPEA) the agency has adopted electronic data maintenance and analysis scheme. The collected data are stored in an electronic database from which the data analysis is conducted using database applications and a software, Statistical Package for the Social Sciences (SPSS). Additional analyses can be streamlined by using this database.

Housing Inspection Services Customer Satisfaction Survey instrument is currently paper-based, and the time it takes per respondent to complete the survey will remain the same as the current OMB inventory.

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.

The information that is gathered in the proposed survey is not available from any other source. Inspection Management will ensure that the proposed survey questionnaires will not ask for any duplicative information by thorough comparison of all questions.

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

Inspector customer service surveys do not impact small businesses or other small entities.

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

If FEMA's customer service surveys were not conducted, the consequences would be the absence of documentation of customer satisfaction for each disaster operation, a vital tool for policy review and measurement of operational performance. If FEMA could not survey the level of customer satisfaction for disaster operation in a timely manner, we would not be able to identify its patterns and trends over and between fiscal years. As stated earlier, customer surveying is a requirement of EO 12862 "Setting Customer Service Standards" and its addendum "Improving Customer Service," and the gathering of program data is required by the GPRA.

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

(a) Requiring respondents to report information to the agency more often than quarterly.

FEMA collects Housing Inspector Customer Service information for each disaster declared for Individual Assistance. Since FEMA does not know frequency of disasters that may occur to the same respondent, we can not predict an annual cycle of this information collection. The information may be gathered more than quarterly; however, it is unlikely to survey the same respondent more than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

Since the surveys are voluntary no situation would require respondents to prepare a written response in fewer than 30 days.

(c) Requiring respondents to submit more than an original and two copies of any document.

There is no situation foreseen that would require the submission of more than an original document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

Respondents are not required to maintain records of the survey or any other documents.

(e) 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.

The survey is designed to produce valid and reliable results that can be generalized to the universe of study.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

There is no special circumstances requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) 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 of data with other agencies for compatible confidential use.

The proposed IC does not include 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 of data with other agencies for compatible confidential use.

(h) 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.

No special circumstances requiring respondents to submit proprietary trade secret, or other confidential information

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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.

A 60-day Federal Register Notice inviting public comments was published on March 8, 2007. No comments were received.

b. 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, or reporting

format (if any), and reported.

on the data elements to be recorded, disclosed, or reported.

FEMA constantly consults with J&E Associates, Inc., a professional services and management consulting firm, on the Housing Inspection Services Survey. J&E administers the survey including data collection, maintenance, analysis and report.

c. Describe consultations with representatives of those from whom information is to be obtained or those who must compile records.

Consultation should occur at least once every three years, even if the collection of information activities is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

FEMA Inspection Management Task Monitors review the comments provided from responding applicants. The qualitative and quantitative information gathered from the open-ended questions in the survey serve as the driving force for any changes FEMA Inspection Management may need. For example, the last question in the customer satisfaction survey instrument is “Please provide any ideas to improve the process” and to outline “any unmet expectations”.

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

Since focus groups were not utilized, neither gift nor other remuneration to respondents applies.

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

The respondents are provided an assurance of confidentiality with the statement in the survey form, which informs that all responses are anonymous and confidential, and will be reported ONLY in aggregate form. FEMA Housing Inspection Management complies with relevant requirements of The Privacy Act of 1974 [<http://www.usdoj.gov/oip/privstat.htm>]. Confidentiality will be assured. Identifying information is necessary to perform the surveys; however, it is not shared with anyone outside of the Agency who does not have a need to know. Survey results are reported in an aggregated format to protect anonymity.

FEMA provides data of individual addresses to the contractor for HICS surveys to be mailed to the respondents. A cover letter is included with the mailed out surveys explaining the confidentiality and that the response is voluntary. If a respondent asks for contact from FEMA, that information is forwarded to the appropriate parties at FEMA.

In the mailings, respondents are assured that their answers will in no way affect the outcome of their application with FEMA. The collected data are password protected and used only by authorized FEMA personnel. There is no intent to track respondents based on gender, race, age, geography or other descriptions.

11. Provide additional justification for any question 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 such sensitive nature in the proposed survey.

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

a. 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 desired. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

The total annual time burden estimated for the collection of information for all surveys is 2,652 hours. See Table 1 for details.

Table 1. Annual Hour Burden Estimate.

Data Collection Activity/Instrument	No. of Respondents for all disasters* ¹	Frequency of Responses	Hour Burden Per Response (hours)	Annual Responses	Total Annual Hour Burden (hours)
	(A)	(B)	(C)	(D) = (AxB)	(E) = (CxD)
Housing Inspection Services Customer Satisfaction Mail surveys	312 x 34 = 10,608	1	.25	10,608	2,652
Total	10,608	1	.25	10,608	2,652

Note

*¹ : The estimated annual number of respondents for all disasters is 10,608, which is derived from the estimate of 34 annual disaster declarations and number of actual respondents according to the sample size of 950 and 32.8% of response rate (950 x 0.328 = 311.6).

b. 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.

This request does not cover more than one form.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

Table 2. Annual Cost to Respondents for Hour Burden.

Data Collection Activity/ Instrument	Respondent's Occupational Category	Median Wage (\$)	Cost for Hour Burden per Respondent (\$)	Total Annual Hour Burden (hours)	Total Annual Cost for Hour Burden (\$)
		(F)		(E) from Table 1	(G) = (FxE)
Housing Inspection Services Customer Satisfaction Survey	All Occupations (See Below)	\$14.15	\$3.54	2,652	\$37,525.8
Total		\$14.15	\$3.54	2,652	\$37,525.8

To provide annualized cost to respondents for the hour burden, we referred to the latest updated 2005 median hourly wage estimate from Bureau of Labor Statistics 'National Occupational Employment and Wage Estimates'. It reports national median and mean hourly rates based on the Standard Occupations Code (SOC). To calculate the cost for hour burden of Housing Inspection Customer Satisfaction Survey, we used the national median hourly wage for all occupations: \$14.15 x .25 burden hours = \$3.54 per respondent.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing 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.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

There is no expected cost to the respondents since there are no recordkeeping or reporting burden on them associated to this data collection. FEMA provides the mailed survey form and a postage paid envelope at no cost to the respondent in the proposed survey.

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Table 3. Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs \$5,600 average per survey task order x 34 declarations per year	\$190,400
Staff Salaries 1 G/S 12/2, 5% of annual salary	\$3,350
Facilities	0
Computer Hardware and Software	0
Equipment Maintenance	0
Travel	0
Printing * ¹	0
Postage (Included in the contract cost of \$3.97 per survey)	0
Other	0
Total	\$193,750

Note

*¹ : Printing of surveys is provided by the FEMA HQ printing office at no cost to the program area.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

Definitions

Program changes should not be confused with adjustments.

i) Program change

A "Program increase" is an additional burden resulting from an action or directive of a branch of the Federal government (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.

A "Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).

ii) An "Adjustment" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or how (e.g., changes in the methods used to estimate burden or correction of errors in burden estimates).

Table 4. Itemized Changes in Annual Hour Burden to Respondents.

Data Collection Activity/Management	Changes in Hour Burden (hours)			
	Current*	Proposed	Program Change	Adjustment
Housing Inspection Services Customer Satisfaction Survey	0	2,652	+2,652	0
Total	0	2,652	+2,652	0

Note: * This is a request for a new OMB control number (see the narrative following).

The proposed information collection (IC), Housing Inspection Services Customer Satisfaction Survey, is currently bundled with other customer satisfaction surveys in the IC under OMB control number 1660-0036, named 'Housing Inspection Survey'. The currently approved hour burden estimate for the survey is 7,500 hours, which is based on 40 disaster declarations per year, and takes account of all the sample elements. That is, the current hour burden includes non-respondents' response time presumed in addition to the actual respondents' response time. In this proposal, we request 2,652 hours of respondents' hour burden, which is derived from a decreased estimate of 34 annual disaster declarations and the estimated number of actual respondents according to the sample size of 950 and 32.8% of response rate. In reality, the requested hour burden (2,652 hours) is 4,848 hours less than the hour burden under the current OMB inventory.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. 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.

The survey report contains descriptive summaries of disaster, survey sample and survey results for more focused questions, frequency distribution for customer satisfaction level, and customer comments stratified into 3 layers of satisfied, neutral and dissatisfied. The survey report for each disaster is distributed within FEMA. The normal schedule for survey projects is displayed in Table 4 below.

Table 5. Survey and report schedule.

Survey	Collection Start	Collection End	Report Expected
Housing Inspection Services Customer Satisfaction Survey	Approximately 21 days after declaration date	Approximately 45 days from start date	Approximately 60 days from start of collection
Semi-annual Summary Reports			June 30 th September 30 th

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

A valid OMB control number, expiration date and burden disclosure notice will be displayed in all collection's material.

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

This collection does not seek exception to the certification statement referenced above.