

**Supporting Statement A for
DOI Programmatic Clearance for Customer Satisfaction Surveys
(OMB Control Number 1040-0001)**

OMB Terms of Clearance: “The programmatic clearance is approved under the following terms of clearance. Prior to the use of each instrument, the agency must submit the survey to OMB for expedited review of 10 business days. The submissions must include the following information: 1. Which program office will be conducting this survey? Who are the customers? Which of the six topic areas will be addressed? 2. How was the survey developed? Who was consulted? What pre-testing, if any, was done? 3. How will the survey be conducted? How is the sample selected? What is the expected response rate and what steps are taken to maximize it? Which mode will be used to administer the survey? 4. How will the results of the survey be analyzed and reported? If the customer population will be sampled, what statistical techniques will be used to generalize the results to the entire population? What level of aggregation will be used? At the conclusion of the review, OMB will inform the OPPM contact by email when the survey has been approved, after which the agency may use OMB number 1004-0001 on the instrument.”

The Terms of Clearance have been met by the requirement that a clearance form that provides all the information specified in the Terms of Clearance must accompany all specific surveys submitted for approval. This clearance form appears in the detailed Guidelines Document that is attached to this information collection request.

Introduction:

The Department of the Interior (DOI) is requesting a three-year extension of its programmatic clearance for customer satisfaction surveys, originally approved by the Office of Management and Budget (OMB) in January 2002. The programmatic clearance enables Interior bureaus and offices to conduct customer research through external surveys such as questionnaires and comment cards. This information is collected to improve the services and products that DOI provides to the public and thus better carry out part of its statutory mission. Information collected under the programmatic clearance has led to a number of improvements. For example, customer feedback has helped the Bureau of Land Management improve the timeliness of several of its permitting processes. A survey of visitors to Fish and Wildlife Service (FWS) refuges has identified two key issues being addressed by FWS to help improve visitor satisfaction with refuge law enforcement and to address differences in way minority groups perceive their experiences at the refuge. The data have also been used to help Interior assess organizational performance and accountability through GPRA strategic planning and performance measurement. DOI anticipates that the information obtained under a renewal of the programmatic clearance will continue to lead to revisions in certain agency processes and policies, development of guidance related to DOI’s customer services, and additional improvements in the way we serve the Nation.

The existing programmatic approval covers all of the bureaus and offices in DOI and provides centralized oversight for all customer satisfaction surveys within Interior. Under the procedures proposed here, the DOI Office of Policy Analysis will conduct the necessary quality control, including assurances that the individual survey instrument comports with the guidelines of the programmatic clearance, and will submit the particular survey instrument and methodology for expedited review to OMB as we are ready to deploy a specific information collection.

Who Will Be Impacted by This Renewal?

Under the proposed programmatic clearance renewal, Interior will seek satisfaction information from its customers. DOI defines the term “Customer” in the following manner:

Customer: Anyone who uses DOI resources, products, or services. This includes internal customers (anyone within DOI) as well as external customers (e.g., the American public, representatives of the private sector, Tribes, academia, and other government agencies). Depending upon their role in specific situations and interactions, citizens and DOI stakeholders and partners may also be considered customers.

We define “Stakeholder” to mean groups, individuals, or Tribes who have an expressed interest in and who seek to influence the present and future state of DOI’s resources, products, and services.

We define “Partner” to mean those groups, individuals, Tribes, and government agencies who are formally engaged in helping DOI accomplish its mission, or with whom DOI has a joint responsibility or mission.

Justification

1. Explain the circumstances that make the collection 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.

Interior requests extension/renewal of its Programmatic Clearance for Customer Satisfaction Surveys so that we may better fulfill our Departmental or program specific statutory mission as well as our government-wide responsibilities to provide excellence in government by proactively consulting with those we serve. Customer data are needed to:

1. Meet requirements of the Government Performance and Results Act (GPRA)
2. Realize the President’s Management Agenda (PMA)
3. Meet requirements of Interior’s Citizen-Centered Customer Service Policy
4. Meet requirements of Executive Order 12862
5. Fulfill our responsibilities to provide excellence in government by proactively consulting with those we serve to identify opportunities to improve our information, services, and products to better meet their needs.

GPRA:

The Government Performance and Results Act (GPRA) of 1993 (Pub.L. No. 103-62) sets out to “improve Federal program effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction” (Section 2.b.3). In order to fulfill this responsibility, DOI’s bureaus and offices must collect data from their respective user groups to (1) better understand the needs and desires of the public and (2) respond to those needs and desires accordingly.

In September 2006, Interior published its updated GPRA Strategic Plan for FY 2007-2012. That plan contains a number of performance measures that directly correspond to customer, partner, and stakeholder satisfaction with specific services of Interior and its bureaus and offices. To accurately report whether or not we met targets set for these performance measures, it is imperative for Interior’s bureaus and offices to collect data from those we serve. Renewal of the Programmatic Clearance for

Customer Satisfaction Surveys is critical to the Department's ability to collect those data needed to help measure progress toward achieving the goals and end-outcomes of our GPRA Strategic Plan.

The President's Management Agenda:

In August 2001, the Office of Management and Budget (OMB) released the President's Management Agenda (PMA), a five-point plan to improve Federal management and program performance in order to make government more citizen-centered and accountable for results. The PMA targets the government's most apparent deficiencies in core management capabilities where the opportunity to improve performance is greatest. The five elements of the PMA include: Strategic Management of Human Capital; Competitive Sourcing; Improved Financial Performance; Expanded Electronic Government and Budget and Performance Integration. In 2001, the Secretary of the Interior released her "Plan for Citizen-Centered Governance: Adding Customer Value by Linking Accountability, Modernization, and Integration." The Citizen-Centered Plan outlined Interior's strategy for improving the delivery of DOI programs and services to those we serve. It is our blueprint for weaving the PMA into the management fabric at Interior. In order to ensure the "customer value" of our activities, Interior must consult and communicate with our customers to obtain their feedback regarding their satisfaction with our services. The renewal of our Programmatic Clearance for Customer Satisfaction Surveys enables us to obtain data that tell us whether or not we are providing "customer value."

Interior's Citizen-Centered Customer Service Policy:

In July 2003, Interior established a new Department-wide policy that admonishes its bureaus and offices to consult and communicate with customers to integrate their feedback into our programs and business processes in order to improve our service to them. It specifically asks Interior bureaus and offices to obtain customer satisfaction data on an annual basis and to use these data to implement programmatic improvements. The renewal of our Programmatic Clearance will assist these organizations in complying with the Departmental policy.

Executive Order 12862 -- "Setting Customer Service Standards":

Executive Order (E.O.) 12862 of September 11, 1993, is aimed at "ensuring the Federal Government provides the highest quality service possible to the American people." The E.O. requires surveys as a means for determining the kinds and qualities of service desired by the Federal Government's customers and for determining satisfaction levels for existing service.

Previous DOI customer surveys have provided useful information to DOI's bureaus and offices for assessing how well we deliver our services and products, making improvements, and reporting on annual performance goals. The results are used internally, and summaries are provided to OMB on an annual basis to satisfy the requirements and spirit of E.O. 12862.

Furthermore, E.O. 12862 requires agencies to provide a "means to address customer complaints." To that end, bureaus and offices may use customer comment cards as an opportunity for customers to provide feedback to the agencies on the service they have received.

In addition to the GPRA and E.O. 12862, the statutes, regulations, and Secretarial Orders that created each of the bureaus and offices strengthen our need to survey our customers in order to deliver quality products and services.

- 2. Indicate how, by whom, and for what purpose is the information to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Chiefly, these data are being collected to improve the service and products that the participating Interior bureaus and offices provide to the public, and thus better carry out part of our statutory mission. Interior managers use customer satisfaction data to support all aspects of planning, from buildings, roads, and interpretive exhibits, to technical systems. In conducting their management, planning, and monitoring activities, managers also use the information to allocate effectively their limited personnel and financial resources to the highest priority elements.

Information collected under the programmatic clearance has led to a number of improvements in the way DOI carries out its mission and serves the public. For example, customer feedback has helped the Bureau of Land Management (BLM) improve the timeliness of several of its permitting processes. A survey of visitors to Fish and Wildlife Service (FWS) refuges identified key issues impacting visitor satisfaction that are currently being addressed by FWS, including satisfaction with refuge law enforcement and differences in satisfaction between races that visit refuge sites. Information collected by the U.S. Geological Survey (USGS) regarding existing and proposed transportation systems at Kilauea National Wildlife Refuge are being used to design alternative means for transporting visitors to the Refuge in response to visitor dissatisfaction with crowded parking areas. A survey conducted by the Bureau of Reclamation (BOR) has helped Reclamation managers identify satisfaction levels with water delivery systems, and to identify improvements.

DOI anticipates that the information obtained will continue to be used in revising certain bureau processes and policies, and developing guidance related to the bureau's customer services. These changes will continue to improve the services DOI provides to the public and, in turn, allow DOI to carry out more effectively a part of its statutory mission.

The Programmatic Clearance is intended to collect customer satisfaction data only. Therefore, survey instruments that will be approved under the authority of the clearance must focus on customer satisfaction data. No information collection instruments seeking to collect information beyond the scope of customer satisfaction data, such as social-science or visitor-use information, will be considered under the scope of this Programmatic Clearance.

Interior's Programmatic Clearance for Customer Satisfaction Surveys is further limited to non-controversial information collections that do not attract attention to significant, sensitive, or political issues. Examples of significant, sensitive, or political issues include: seeking opinions regarding political figures; obtaining citizen feedback related to high-visibility or high-impact issues like the reintroduction of wolves in Yellowstone National Park, the delisting of specific Endangered Species, or drilling in the Arctic National Wildlife Refuge.

All information collection instruments will be designed and deployed based upon acceptable statistical practices and sampling methodologies, and will be used to obtain consistent, valid data that are representative of the target populations and account for non-response bias, in conformance with OMB "Guidance on Agency Survey and Statistical Information Collections (January 20, 2006)."

Allowable Information Collection Methods

In-person intercept surveys: In a face-to-face situation, the survey instrument is provided to a respondent who completes it while on site and then returns it. This may include oral administration or the use of electronic technology and kiosks. The survey proctor is prepared to answer any questions the respondent may have about how to fill out the instrument but does not interfere or influence how the respondents answer the questions.

Telephone interviews or questionnaires: Using existing databases, an interviewer will contact customers who have had a specific experience with the agency. The interviewer will dial back until the customer has been reached. Once contacted, the survey respondent is given a brief introduction to the survey, including its importance and use. The interviewer will then expeditiously move through the survey questions.

Mail and e-mail surveys: Using existing lists of customer addresses, a three contact-approach based on Dillman's ATailored Design Method@ will be employed. The first contact is a cover letter explaining that a survey is coming to them and why it is important to the agency. The second contact will be the survey instrument itself along with a postage-paid addressed envelope to return the survey. The third contact will be a reminder postcard sent 10 days after the survey was sent. Finally, the respondents will receive a letter thanking them for the willingness to participate in the survey and reminding them to return it if they have not already done so. At each juncture, the respondents will be given multiple ways to contact someone with questions regarding the survey (including phone, FAX, web, and email). If the survey has been lost, the respondent can request that another be sent to them. Electronic mail is sometimes used instead of postal mail to communicate with customers. Although this is a cost-effective mode to survey a large group of people, it does not usually generate the best response rate. Telephone calls to non-respondents can be used to increase response rates.

Web-based: For products or services that are provided through electronic means, whether e-commerce or web-based information, a web or email survey may be most appropriate. During the course of their web interaction, users can volunteer to add their name to a list of future surveys. From this list, a respondent pool will be selected in accordance with the sampling procedures outlined above. An email will be sent to them explaining the need and importance of the survey with a web link to the survey. Within 5 days, a follow-up email will be sent to the respondents reminding them to complete the survey. Finally, the respondents will receive an email thanking them for the willingness to participate in the survey and reminding them to complete it if they have not already. The respondent will always have the option to submit the survey in paper form, should they elect to do so.

Focus groups: Some data and information are best collected through more subjective, conversational means. A focus group is an informal, small-group discussion designed to obtain in-depth qualitative information. Individuals are specifically invited to participate in the discussion, whether in person or through technologically enhanced means (e.g., video conferencing, on-line sessions). Participants are encouraged to talk with each other about their experiences, preferences, needs, observations, or perceptions. A moderator whose role is to foster interaction leads the conversation. The moderator makes sure that all participants are encouraged to contribute and that no individual dominates the conversation. Furthermore, the moderator manages the discussion to make sure it does not stray too far from the topic of interest. Focus groups are most useful in an exploratory stage or when the bureau/office wants to develop a deeper understanding of a program or service.

Using the best in focus group research practices, groups will be constructed to include a cross-section of a given customer group. The questions and additional probes used during the focus groups will be consistent with the Aguideline menu.@

Comment Cards: Comment cards, when provided to a customer at the time a product or service is provided, offer an excellent means to give the bureaus and offices feedback. A comment card should have a limited number of questions and an opportunity to comment. These comment cards provide managers and service providers with direct and specific information from their customers that could not be obtained through any other means.

Electronic users may be offered the opportunity to complete a comment card via a Apop-up@ window (or other web-enabled means that may be available). The Apop-up@ window will not appear for every user; rather, the users will be selected randomly to receive the survey. This practice is widely used in private industry. In other instances, the electronic user may be offered the option to self-select in answering the electronic comment card.

Whether using paper or electronic comment cards, the intent is to provide a feedback mechanism. The data are not intended to be statistically significant. Although questions may include numeric scales, those data should be considered only in an anecdotal fashion and not reported as a significant measure.

Types of Questions Asked

There are six topic areas that the participating bureaus and offices would obtain voluntary information from their customers. It is not expected that any one survey will cover all the topic areas; rather, these topic areas serve as a “guideline menu” from which the agencies will develop their questions. Under the information collection process, the Department, its offices, and bureaus will develop questions that fit within the generally understood confines of the topic area. Questions may be asked in languages other than English (e.g., Spanish), where appropriate.

(1) Delivery, quality and value of products, information, and services:

The range of questions envisioned for this topic area will focus on customer satisfaction with aspects of information, products, and related services offered by DOI. Information, products, and services include written reports, press releases, computer modules, workshops and seminars, or technical assistance. Respondents may be asked for feedback regarding the following attributes of the information, service, and products provided:

- Timeliness (Was the information, service, product provided to you in a timely manner?) (Was the information itself timely?)
- Consistency (Was the quality of the service consistent with your expectations?)
- Accuracy (Were the data provided accurate?)
- Ease of Use and Usefulness (Was the product easy to use? Was the information useful to you?)
- Ease of Information Access (Were you able to find the information you needed easily?)
- Helpfulness (Was the information helpful?)
- Quality (Was the information of high quality?)
- Value for fee paid for information/product/service (Was the cost of the product, information, or service appropriate for the value?)

(2) Management practices:

This area covers questions relating to how well customers are satisfied with Interior management practices and processes, what improvements they might make to specific processes, and whether or not they feel specific issues were addressed and reconciled in a timely, courteous, responsive manner. Questions within this area may involve feedback regarding how well Interior engaged customers on a specific topic. They may also seek opinions from customers regarding how well Interior programs are managing and administering specific processes (for example, the Bureau of Land Management may ask customers how well it is administering its permitting processes.)

(3) Mission management:

Questions will ask customers to provide satisfaction data related to Interior’s ability to protect, conserve, provide access to, provide scientific data about, and preserve natural, cultural, and recreational resources that we manage, and how well we are carrying out our trust responsibilities to American Indians, Native Alaskans, and Insular Areas. Questions will specifically ask customers to provide satisfaction data related to each of its four mission

areas as described in its GPRA Strategic Plan: Resource Use, Resource Protection, Serving Communities, and Recreation.

(4) Rules, regulations, policies:

This area focuses on obtaining feedback from customers regarding fairness, adequacy, and consistency in enforcing rules, regulations, and policies for which Interior is responsible. It will also help us understand public awareness of rules and regulations and whether or not they are explained in a clear and understandable manner. It will not seek opinions from customers regarding the appropriateness of regulatory rulings themselves.

(5) Interactions with DOI Personnel and Contractors:

Questions developed under this topic area will focus on obtaining customer feedback regarding attributes of interactions with Interior office and bureau employees, as well as Interior contractors. Attribute questions will range from timeliness and quality of interactions to skill level of staff providing the assistance, as well as their courtesy and responsiveness during the interaction.

(6) General demographics:

Some general demographics may be gathered to augment satisfaction questions in order to better understand the customer so that we can improve how we serve that customer. Demographics data will range from asking customers how many times they have used an Interior service or visited an Interior facility within a specific timeframe, to their ethnic group and race. Sensitivity and prudence will be used in developing and deploying questions under this topic area so that the customer does not perceive an intrusion upon his/her privacy. Additionally, these questions will only be asked as long as the data are critical to understanding customer satisfaction and the character of the customer base. Demographics may also be used as part of a non-response bias strategy to ensure responses are representative of the contact universe.

How are data used?

Managers and program specialists use these data to identify:

- Service needs of customers
- Strengths and weaknesses of services
- Ideas or suggestions for improvement of services from our customers
- Barriers to achieving customer service standards
- Changes to customer service standards
- Baselines to measure change in improving service delivery over time
- Improving public trust in government

Strategic Plan/Annual Performance Plan Measures

In fulfilling the requirements of the GPRA, DOI and all of its bureaus and offices have created a new Strategic Plan in coordination with their respective stakeholders. The GPRA requires the DOI to report annually on its progress toward achieving the goals outlined in the Annual Performance Plan. Some of the data collected will be used as the basis for or in support of specific performance measures. These data are reported within Interior's Annual Performance and Accountability Report, which is audited by an independent contractor for accuracy and validity.

For example, the USGS must provide data to show customer satisfaction with the science it provides for specific program areas including geologic hazards. The FWS, NPS, and BLM must provide data regarding the satisfaction of visitors with their recreation experience on public lands managed by these bureaus. The BIA must provide data to show beneficiary satisfaction with its trust management programs. To provide data needed for these and other Strategic Plan performance measures, the bureaus must use various information collection instruments such as surveys and questionnaires.

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 [and specifically how this collection meets GPEA requirements].

Improved information technology will be used, when possible, to reduce the burden on the public and to comply with requirements of the Government Paperwork Elimination Act (GPEA). E-mails may be used to introduce and distribute information collection instruments to a sample of customers. In some cases, the instruments may be web-enabled so that respondents can complete them online, enabling the response analysis to be automated. We estimate that about 10% of our responses will be collected electronically. In all cases, appropriate non-response bias strategies will be used to ensure that responses are representative of the contact universe. Electronic media will not be used to select sampling frames for surveys to be conducted under the generic clearance.

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.

This effort does not duplicate any other survey being done by DOI or other Federal agencies. Other Federal agencies are conducting user surveys but are not soliciting comments on the delivery of DOI or DOI bureau/office products and services.

DOI is keeping abreast of what other Federal agencies are doing regarding customer surveys. The participating bureaus and offices work in partnerships with the Interagency Customer Forum (coordinated by the Federal Consulting Group). The Forum identifies and develops crosscutting performance goals, shares customer service methodologies and related information, and ensures

comparability of data to eliminate redundancy. Furthermore, DOI's Customer Forum, which includes representatives of the bureaus in DOI, regularly meets to discuss the crosscutting issues and data needs in the customer service arena.

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 burden.

One of the main purposes of this effort is to gather information needed without putting a significant additional burden on small entities. Sampling will be used and the number of questions on the surveys will be kept to a minimum. Use of electronic means of surveying also has the potential to reduce the burden on small entities.

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 burden.

Without this information collection, DOI will not be able to determine the kind and quality of service customers want, their level of satisfaction, or ways to improve customer service in a timely manner. The Programmatic Clearance for Customer Satisfaction Surveys enables bureaus and offices within the Department of the Interior to collect customer satisfaction data in an expedited manner, which not only helps us obtain data from customers more quickly, but enables us to respond to customer concerns in a manner that better meets customer expectations.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner: (i) requiring respondents to report more often than quarterly, (ii) requiring respondents prepare written responses in fewer than 30 days after receipt, (iii) requiring respondents to submit more than an original and two copies of any document, (iv) retain records for more than 3 years; (v) 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; (vi) the use of a statistical data classification that has not been reviewed and approved by OMB; (vii) that includes a pledge of confidentiality not supported by authority established in statute or regulation; requiring respondents to submit proprietary trade secrets or other confidential information.

This renewal request contains no special circumstances with respect to 5 CFR 1320.5 (2) (i) and (iii-viii) with the exception of (ii). We may be asking respondents to send back their responses in fewer than 30 days after receipt of the survey. On these types of surveys, respondents normally will respond rather quickly if they intend to respond at all. The first survey (for each bureau's customer line) will provide our baseline data, and we will consider all responses until the time we make the final baseline report. These are voluntary surveys and respondents, of course, are not obligated to respond.

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 in response to the PRA statement associated with the collection over the past three years] 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 of 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 on the data elements to be recorded, disclosed or reported [Please list the names, titles, addresses, and phone numbers of persons contacted.] Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 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.

As required in 5 CFR 1320.11, DOI provided the 60-day review and comment process with a notice published in the *Federal Register* on January 16, 2008 (Volume 73, Number 11, pages 2936-2937). Only one comment was received from the public notice. The comment came from B. Sachau of Floram Park, NJ, via email on January 16, 2008, who expressed general opposition to DOI conducting customer satisfaction surveys because they would be wasteful and accomplish nothing. Because customer satisfaction surveys are required by law and policy, and the comment provided no specifics, no changes have been made to the information collection renewal request as a result of this comment.

The DOI bureau information collection clearance officers were surveyed about the importance to them of continuation of this OMB programmatic approval. They all expressed strong support for its extension.

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

Incentives, remuneration, and gifts are generally deemed inappropriate as part of plans for information collections conducted within the scope of the Programmatic Clearance for Customer Satisfaction Surveys. In some cases, the provision of gifts and incentives to customer satisfaction survey respondents may appear to be a conflict of interest. However, there may be extraordinary circumstances under which remuneration may be appropriate within the scope of this program. In the cases of information collections that seek to use incentives under extraordinary circumstances, Interior program managers must describe the proposed incentive, how it will be offered to respondents, and provide a justification of its use within the supporting statement, which is required as part of each information collection request under this package.

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

Confidentiality issues in each proposed information collection instrument will be assessed and addressed in accordance with OMB guidance as provided in “Guidance on Agency Survey and Statistical Information Collections (January 20, 2006).”

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

The questions used on these surveys will not be of a sensitive nature.

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

Based on experience with the existing Programmatic Clearance, we estimate that there will be approximately 60,000 respondents submitting surveys annually and that it takes approximately 15 minutes to complete each survey. We also estimate that there will be approximately 60,000 respondents submitting comment cards annually and that it takes 3 minutes to complete each comment card. Given these estimates, DOI anticipates a budget of 18,000 hours per year for these proposed collections.

We estimate, based on a \$26.09 per hour* valuation of volunteer time and the projected burden hours, an approximate aggregate annual cost to respondents of \$469,620. [*Hour cost based on BLS news release USDL 07-1883 of December 11, 2007, for average full compensation per hour including benefits for private industry.]

13. Provide an estimate of the total annual (non-hour) cost burden to respondents or recordkeepers resulting from the collection of information.

We have identified no reporting and recordkeeping “non-hour cost” burdens associated with this proposed collection of information.

14. Provide an estimate of annualized cost to the Federal Government.

The bureaus and offices will, on a case-by-case situation, determine if it is more efficient and cost effective to develop, distribute, collect, and analyze these surveys in-house or to turn to private or other non-government entities to provide that service. However, in order to provide a reasoned estimate, we have assumed a ratio of three hours of Federal work for each hour of survey time, with the Federal work at an average pay level of GS-12 step 4, which is \$30.42 per hour based on OPM Salary Table 2008-GS. Using a multiplier of 1.5 [as implied by the previously referenced BLS news release] to add benefits, the full compensation cost would be \$45.63 per hour. Thus, the estimated annual cost to the Federal government is 18,000 hours times 3 times \$45.63 per hour, which is \$2,464,020.

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

There are no program changes or adjustments for this renewal.

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

Each information collection considered under the Programmatic Clearance will describe how the data will be used. Each information collection will provide to OMB the specific tabulation methods used to synthesize, analyze and aggregate data collected.

These data will be collected annually, with information collections scheduled to correspond to the time period that will gain the greatest response rates for the given group.

The aggregate information will be published annually and available on the Internet as well as through discrete publications that will best reach the respective groups.

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.

We will display OMB's expiration date on the information collection instruments.

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

We are requesting no exceptions to the certification statement.