SUPPORTING STATEMENT FOR REQUESTS FOR APPROVAL UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320

Tennessee Valley Authority (TVA) - Valley Relations External Stakeholder Survey

A. 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.

   Valley Relations is TVA's liaison with the public officials who serve the seven-state TVA region. The public officials include congressional district offices, governors, state legislators, city and county mayors, and various other state and local officials.

   Valley Relations is seeking to obtain feedback from the public officials it serves. The feedback will help Valley Relations evaluate its performance and identify areas of effectiveness and opportunities for future improvement.

   As part of its performance management process, Valley Relations measures its performance using a report card. The report card includes two performance indicators related to how well Valley Relations serves its stakeholders (public officials who serve the seven-state TVA region). One performance indicator is related to the percentage of Valley Relations' external stakeholders who feel Valley Relations helps them better understand TVA's policies, programs, initiatives and regional issues. A second performance indicator is related to the percentage of Valley Relations' external stakeholders who are satisfied with the service provided by their Valley Relations representative.

   At the beginning of the fiscal year, Valley Relations set a goal for each of the performance indicators. The Valley Relations External Stakeholder Survey will provide information needed to measure the group's performance and determine whether the group met its goals related to the two performance indicators mentioned above. It will also give survey respondents an opportunity to provide additional feedback that will help Valley Relations identify opportunities for future improvement. Valley Relations will use feedback received to determine goals and objectives for next fiscal year.

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.

   Valley Relations will use the feedback to determine its performance including determining how effectively it helps its key stakeholders better understand TVA's policies, programs, and initiatives. It will also help identify areas for future performance improvement.

   The information will be processed within TVA. Feedback will not be shared outside of Valley Relations (except with the TVA statistician who is assisting with the feedback analysis). No external resource will be used to gather or process the information. Data collected will be used by Valley Relations for performance improvement purposes only.

   Valley Relations is TVA's liaison with the public officials who serve the seven-state TVA area. These public officials are considered Valley Relations' external stakeholders. They include congressional district offices, governors, state legislators, city and county mayors that interact with TVA, and various other state and local officials. Valley Relations has approximately 600 external stakeholders. The entire group of external stakeholders (or a representative from their staff) will receive the survey.

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.

   The information will be collected via paper copy only. To ensure all intended recipients receive the survey, paper copies will be mailed to all survey recipients. Survey recipients will be provided self-addressed, stamped envelopes to return the completed survey to TVA. The surveys will be collected and provided to a TVA statistician, who will analyze the feedback and prepare an analysis report of the data.

   Using paper copies only will allow for consistent collection of the information. Many of the public officials are bi-vocational and do not work full-time in their role as an elected official. They may not have an official e-mail account related to their public office. Even if they have an e-mail account, it may not be active or accessed by the public official during certain times of the year. For example, state legislators are not in their Capitol Hill offices when the state legislature is not in session. In these cases, home or local mailing addresses will be used for the survey.

   Since information received via FAX can arrive at times when the FAX machine is not being monitored, FAX capabilities will not be offered to return the completed survey. This will also help maintain confidentiality of the information received.

   Feedback received will be entered into electronic spreadsheets for calculation and analysis. Statistical methods will be employed in the data analysis. See Supporting Statement Part B.

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.

   Valley Relations is a unique organization within the Tennessee Valley Authority. The requested feedback does not exist in any other format. The survey will ask specific questions related to the service provided by Valley Relations to its external stakeholders. Other than verbal comments and feedback offered voluntarily by the external stakeholders, this is their only means of submitting formal feedback regarding the service provided by Valley Relations.

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

   This information collection is targeted at individual public officials only. No other members of the public or groups such as businesses will be included.

6. Describe the consequences 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.

   This collection of information will help the Valley Relations organization be more effective and, as a result, will help TVA be more effective in its relations with public officials.

   The information will be collected no more than once during a calendar year. Survey recipients are not required to complete the survey. Survey completion is strictly voluntary. Responses are anonymous and will be kept confidential.

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 prepare a written response to a collection of information in fewer than 30 days after receipt of it;
   - 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 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 statue 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; 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.

None.

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 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.

   TVA published notices in the Federal Register telling the public that TVA is proposing this information collection. In the notices, we told the public to contact us for copies of what is being submitted to OMB, and instructed them to give us their comments. TVA did not receive any comments from the public.

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

   Participants will not receive any payment or gift for participating.

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

    Survey respondents will not be asked to reveal their identities. The information will be submitted anonymously. Individual data will not be reported. Feedback will be combined with those from other respondents and will be reported in aggregate form. Professional survey research standards will be used and applied throughout the process.

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.

    Not applicable.

    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 hour 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.

Estimated Number of Annual Responses: 600
Frequency of Use: No more than once per calendar year
Annual Hour Burden: 10 minutes per survey
Estimated Total Annual Burden Hours: 100

The survey will be sent to approximately 600 public officials. The survey is brief and will take approximately 10 minutes to complete. Therefore, the estimated total number of annual burden hours is 100.

The recipients of the survey range from small town part-time mayors to full-time state officials. Therefore, their salaries cover a broad range. Since the survey is brief and can be completed in 10 minutes or less, the cost of each respondent completing the form is minimal.

There is no actual cost to the Federal government for this information collection. The Valley Relations organization is funded by power revenues under TVA's Communications, Government and Valley Relations organization.

12. Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 rates 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.

None.

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.

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

    Not applicable.

14. 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.

    Not applicable.

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

    Not applicable.

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

    Not applicable.