

Date: October 31, 2008

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - NW32

Title: FEMA Public Assistance Program Customer Satisfaction Survey

Form Number(s): FF 90-152

General Instructions

A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. When Item 17 or the OMB Form 83-I is checked "Yes," Section B of the Supporting Statement must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

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. Provide a detailed description of the nature and source of the information to be collected.

Executive Order (EO) 12862 requires that all Federal agencies survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services. The Government Performance and Results Act (GPRA) requires agencies to set missions and goals, and measure performance against them. FEMA will fulfill these requirements by collecting customer satisfaction with service and program evaluation information through administration of surveys of the Disaster Assistance Directorate (DAD) external customers. The results will come from the FEMA Public Assistance Program Customer Satisfaction Survey.

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 Managers use the survey results to measure program performance against standards for performance and customer service; measure achievement of GPRA objectives; and generally gauge and make improvements to disaster services that increase customer satisfaction and program effectiveness. The information is also used by Federal Coordinating Officers and Program Heads to identify trends in disaster operations. The results of the customer satisfaction surveys will be shared with FEMA HQ and the Regions Public Assistance Program Offices.

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.

Applicants responding to the FEMA Public Assistance Survey have a choice of responding via paper or web-based survey tools. The web-based survey instrument mirrors the paper-based survey instrument. If the respondent elects to complete the web-based survey, it is submitted on-line. Currently the percentage of the responses collected electronically is approximately 27.1%.

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 survey is not available from any other source. DAD will ensure that the proposed survey does not ask for duplicative information through thorough comparison of all questions. The survey is specifically targeted for the FEMA Public Assistance customers.

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.

There is no impact on 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.

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. If FEMA’s customer service surveys were not conducted, FEMA

would not be in compliance with these requirements and the absence of documentation of customer satisfaction for each disaster operation, a vital tool for policy review and measurement of operational performance, would not be available. If FEMA could not survey on the disaster assistances in a timely manner, we would not be able to identify patterns and trends over and between fiscal years.

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.

There is no requirement for respondents to report information to the agency more often than quarterly.

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

There is no requirement to provide a written response to the collection in less than 30 days after receipt of it.

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

There is no requirement to submit more than an original and two copies of any document.

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

There is no requirement to retain records for more than three years.

(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 proposed survey is a universal survey—all applicants from a declared disaster are surveyed.

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

There is not use of statistical data classification in this collection 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.

There is no pledge of confidentiality that is not supported by authority established in statute or regulation for this data collection.

(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.

There is no requirement for respondents to submit proprietary trade secret, or other confidential information for this data collection.

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 August 6, 2008, Volume 73, Number 152, pp. 45776. One comment not relevant to the topic of collection was received. See attached copy of the published notice included in this package.

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

DAD uses the services of a contractor, Emergency Response Program Management Consultants, to design processes and instruments. The mailing of surveys for Public Assistance and receipt of responses is managed by a subcontractor, HumRRO.

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.

DAD had used focus groups to ensure that the information we are collecting is meaningful to customers and the survey questions are clearly understood. There was a

small Public Assistance focus group study conducted in 1997. No additional focus groups have been held since the four focus groups in 2004.

Public Assistance will conduct focus groups sometime within the next three years to review its performance indicators again.

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

There are no payments or gifts to respondents for this data collection.

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

The information will be kept private or anonymous to the extent allowable by law.

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 a sensitive nature required in this data collection.

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 for each collection instrument (separately list each instrument and describe information as requested). 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 estimated annual burden is 1,920 hours based on 3,360 respondents consisting of 2384 respondents for the paper form and 896 for the web-based with an estimated 20-minute (.3 hour) response time per respondent per survey and 80 respondents for the focus group at 11.7 hours each.

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.

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 A.12: Estimated Annualized Burden Hours and Costs

Type of Respondent	Form Name / Form Number	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Annual Burden (in hours)	Avg. Hourly Wage Rate	Total Annual Respondent Cost
	Paper						
Business or other for-profit	FF 90-152	145	1	.3	43.5	28.51	1,240.19
Not-for-profit institutions	FF 90-152	727	1	.3	218.1	19.29	4,207.15
State, Local or Tribal Government	FF 90-152	1512	1	.3	453.6	23.99	10,881.86
Sub-total		2384			715.2		16,329.20
	Web-based						
Business or other for-profit	FF 90-152	55	1	.3	16.5	28.51	470.42
Not-for-profit institutions	FF 90-152	273	1	.3	81.9	19.29	1,579.85
State, Local or Tribal Government	FF 90-152	568	1	.3	170.4	23.99	4,087.90
Sub-total		896			268.8		6,138.17
State, Local or Tribal Government	Focus Group	80	1	11.7	936	23.99	22,454.64
Total		3,360			1,920		\$44,922.01

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all workers in the business and financial operations occupations is \$28.51 per hour. Therefore, the estimated burden hour cost to respondents for Business or other for-profit is estimated to be \$1,710.61.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all workers in the Not-for-profit professions is \$19.29 per hour. Therefore, the estimated burden hour cost to respondents for Not-for-profit institutions is estimated to be \$5,787.00.

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for state and local officials is \$23.99 per hour. Therefore, the estimated burden hour cost to respondents for State, Local or Tribal Government is estimated to be \$37,424.40.

Therefore, the total annual respondent cost is \$44,922.01.

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

Annual Cost Burden to Respondents or Record-keepers

Data Collection Activity/Instrument	*Annual Capital Start-Up Cost (investments in overhead, equipment and other one-time expenditures)	*Annual Operations and Maintenance Cost (such as recordkeeping, technical/professional services, ect.)	Annual Non-Labor Cost (expenditures on training, travel and other resources)	Total Annual Cost to Respondents
	0	0	0	\$0.00
Total	0	0	0	\$0.00

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.

Annual Cost to the Federal Government

Item	Cost (\$)
Contract Costs [Based on number of survey respondents described in Table 1 and	339,406.57

actual costs for FY05 survey]	
Staff Salaries [2 of GS 13 employees spending approximately 40% of time annually to conduct the survey for this data collection, [86,927.00 x .40] x 2]	69,541.60
Facilities [cost for renting, overhead, etc. for data collection activity]	
Computer Hardware and Software [cost of equipment annual lifecycle]	
Equipment Maintenance [cost of annual maintenance/service agreements for equipment]	
Travel	1,742.00
Printing [included in the contract cost]	
Postage [included in the contract cost]	
Other Focus Group Cost(no report print or distribution cost)	4,250.00
Total	\$414,940.17

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.

A "Program increase" is an additional burden resulting from an federal government regulatory action or directive. (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).

"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 changes in the methods used to estimate burden or correction of errors in burden estimates.

Itemized Changes in Annual Burden Hours						
Data collection Activity/Instrument	Program Change (hours currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (hours currently on OMB Inventory)	Adjustment (New)	Difference
FF 90-152 (Paper)				0	715.2	+715.2
FF 90-152 (Web-based)				0	268.8	+268.8
Focus Group				0	936	+936
Total(s)				0	1,920	+1,920

Explain: There is an increase in the annual burden hour estimate for this submission. The annual burden has increased because this collection is new and not on the current OMB Inventory.

Itemized Changes in Annual Cost Burden						
Data collection Activity/Instrument	Program Change (cost currently on OMB Inventory)	Program Change (New)	Difference	Adjustment (cost currently on OMB Inventory)	Adjustment (New)	Difference
FF 90-152 (Paper)				0	16,329.20	+16,329.20
FF 90-152 (Web-based)				0	6,138.17	+6,138.17
Focus Group				0	22,454.64	+22,454.64
Total(s)				0	\$44,922.01	+\$44,922.01

Explain: There is an increase in the annual cost burden for this submission. The annual cost burden has increased because this collection is new and not on 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.

This information collection will not be published for statistical purposes.

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

This collection does not seek approval to not display the expiration date for OMB approval.

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 “Certification for Paperwork Reduction Act Submissions”.