

Supporting Statement to Accompany
OMB Clearance of Customer Satisfaction Surveys:
2009 HUD Partners Surveys
Part A: Justification

U.S. Department of Housing and Urban Development

May 2009

PART A: JUSTIFICATION

A1 Circumstances that Make the Collection of Information Necessary

This information collection consists of surveys of key customers—program delivery partners—of the U.S. Department of Housing and Urban Development (HUD) to determine whether the Agency is appropriately and adequately serving their needs. It follows from HUD's commitment, as articulated in its Annual Performance Plan, to measure its partners' satisfaction with its performance, operations and programs, as well as changes in satisfaction.¹ The surveys' purpose is to facilitate the acquisition of information that will help the Department improve its performance, not only in relation to its partners but, more importantly, its end customers. The premise is that when those who deliver HUD's programs receive quality service from HUD, the individuals and households who benefit from HUD's programs and activities will, in turn, receive the best possible service.

The current effort is a follow-up to two previously approved information collections—the first for establishing baseline measures and the second for an initial follow-up. A report on the baseline survey, *How's HUD Doing: Agency Performance as Judged by Its Partners*, was published in 2001. OMB approval for that survey ended on October 31, 2003. A report on the second survey, *Partner Satisfaction with HUD's Performance: 2005 Survey Results and Trends Since 2001*, was published in 2006. OMB approval for that survey ended on May 31, 2008.

The information produced by this customer satisfaction survey will enable HUD to better serve its program delivery partners by identifying aspects of HUD's service that need improvement. It will also enable the Agency to determine whether its customer service, and the satisfaction of its partners, has improved over the last four years. Finally, as a significant extension of the previous partners' surveys, the 2009 surveys will provide reports on customer service and satisfaction at the field office level—where most contact with HUD partners takes place on a day-to-day basis.

A2 How and By Whom the Data Will Be Used

This section discusses how and by whom the data will be used. It provides a project overview, states the purpose of the data collection, indicates who will use the information, and gives justification for the various items to be included in the survey.

¹HUD's *FY 2008 Annual Performance Plan* states that HUD will again survey its partners to determine their satisfaction with the Department and compare the findings with prior surveys to measure change over time.

A2.1 Project Overview

HUD administers an array of programs in the housing, public housing, fair housing, and community and economic development areas. HUD's end customers generally receive assistance, services, or benefits through intermediaries (i.e., program delivery partners) such as public agencies that own and manage public housing, fair housing agencies that provide educational and adjudication services, and state and local government agencies and officials involved in community improvement. This data collection consists of a survey by mail, with telephone follow-up, of six distinct partner groups—consisting of approximately 3,800 partners.

A2.2 Purpose of the Data Collection

The information produced by this customer satisfaction survey will measure changes in partners' opinions since 2005 when HUD last conducted a similar survey of its partners. A report based on the information gathered in this study will satisfy HUD's *FY 2008 Annual Performance Plan* requirement and is intended to provide information that supports better cooperation toward meeting objectives shared by HUD and its partners.

A2.3 Who Will Use the Information

The customer satisfaction survey findings will be used by senior Department management and program staff, including the Office of Field Policy and Management, to assess and improve organizational performance. In particular, the survey results will enable HUD to identify specific issues regarding HUD-customer relationships that partners consider to be impediments to their efforts to implement HUD's housing, community development, and fair housing programs.

The information will also be made available in report form for dissemination to the general public—including the participating partner groups and other stakeholders and interested parties—to allow for public assessment of HUD's performance vis-à-vis its program delivery partners.

A2.4 Survey Instrument

Consistent with the surveys conducted in 2005, respondents will consist of six partner groups, five of which were surveyed in prior years: mayors, directors of public housing agencies, directors of community development departments, executives of National Association of Housing Partnerships (NHPN)-affiliated nonprofit organizations, and directors of fair housing agencies. A sixth partner group, directors of Fair Housing Initiative Program (FHIP) grantees, is new to the 2009 survey. The survey instrument, containing approximately 45 questions, is divided into two clusters. The first cluster,

approximately 35 questions, will be completed by, or administered to, all respondents; the second cluster, containing approximately 15 questions, is specific to each partner type.

Cluster one: questions that apply to all partner groups. The first cluster of questions deals with:

- Satisfaction with HUD's programs and the way HUD runs its programs
- Opinions about the quality and timeliness of information received from HUD
- Opinions about the quality and consistency of guidance received from HUD
- Satisfaction with partners' ability to reach staff at HUD when necessary
- Opinions about responsiveness and competence of HUD staff
- Satisfaction with training and technical assistance
- Satisfaction with electronic communication
- Satisfaction with Grants.gov (formerly eGrants)
- Opinions about HUD's management controls and monitoring systems

Collectively, these items cover key dimensions of HUD's relationships with its partners and will provide the Department with information on specific areas of performance.

Cluster two: questions specific to each partner group. Because each partner group has a somewhat different type of relationship to and association with HUD, the survey instrument includes questions specific to each group. Based on input from HUD program offices and previous input from representatives of the organizations that represent such groups, the following types of items are considered central to assessing HUD's service to each group:

- **Questions for mayors (local chief elected officials):** These questions address the relationship of the local community to HUD. Questions assess respondents' satisfaction with assistance in such areas as reaching out to faith-based and community organizations, implementing provisions of the Housing and Economic Recovery Act of 2008, addressing local foreclosure issues, improving the energy efficiency of housing supported by HUD, the importance of the Consolidated Plan and satisfaction with interactions with HUD's field offices and headquarters.
- **Questions for Community Development Department directors:** These questions address satisfaction with assistance in such areas as reaching out to faith-based and community organizations, implementing provisions of the Housing and Economic Recovery Act of 2008, addressing local foreclosure issues, improving the energy efficiency of housing supported by HUD, the Consolidated Plan Management Process Tool, guidance related to developing the Consolidated Annual Performance Report (CAPER), the

Integrated Disbursement and Information System (IDIS), and e-snaps, HUD's online application process for the Continuum of Care (CoC) grant competition.

- **Questions for Public Housing Agency directors:** These questions ask the respondent to characterize changes in its agency's relationship with HUD over time and whether improvements have or have not occurred in the following areas: Public Housing Assessment System, physical inspections performed by HUD's Real Estate Assessment Center, electronic financial reporting to REAC, the Section Eight Management Assessment Program, and HUD's capacity to monitor and provide oversight of agency activities. Questions also address satisfaction with the Rental Housing Integrity Improvement Project, ability of HUD field office personnel to consistently and reliably interpret policies and regulations, HUD's capacity to collect and make available tenant data reports in the PIH Information Center system, the Enterprise Income Verification system, HUD's assistance related to improving the energy efficiency of housing supported by HUD programs, and its assistance for implementing asset management requirements.
- **Questions for NHPN local housing development nonprofit organization directors:** These questions address respondents' satisfaction with a number of HUD programs, including homeownership counseling, resident services, economic development activities, homeless assistance activities, community development activities, and rental/voucher administration, and with HUD assistance related to implementing provisions of the Housing and Economic Recovery Act of 2008, addressing local foreclosure issues, and improving the energy efficiency of housing supported by HUD.
- **Questions for Fair Housing Agency directors:** These questions address respondents' satisfaction with on-site performance assessment, assistance related to addressing predatory lending, the upgrading and effectiveness of TEAPOTS, adequacy of reimbursements from HUD, and their relationships with FHIP organizations.
- **Questions for Fair Housing Initiative grantee directors:** These questions address respondents' satisfaction with HUD's support and assistance related to the grantees' activities in addressing predatory lending, and their relationships with FHAP agencies.

A3 Use of Improved Technologies

Under contract to the Urban Institute (Washington, DC), the surveys will be

administered by Silber & Associates, an independent survey research organization (Clarksville, MD), which makes full use of the latest methodological and technical developments in mail surveys and telephone interviewing, including proprietary software to check the accuracy of mailing addresses. The surveys will be conducted by mail, with telephone follow-up where appropriate or necessary.

A4 Efforts to Identify Duplication

Discussions with knowledgeable HUD officials and others outside the Department indicate that there are no similar, independently conducted surveys of a broad range of HUD partner groups that assess HUD's current organizational performance or changes in performance since the 2001 baseline survey and the 2005 follow-up survey.

A5 Involvement of Small Entities

All respondents to this survey will be official representatives of communities, public agencies, or non-profit organizations that partner with HUD to provide services or benefits to end customers. Since some respondents will be officials of small non-profit organizations, establishing the voluntary nature of participation in this survey is geared to minimize the perceived burden on such entities. Based on the experience with predecessor surveys in 2001 and 2005, the vast majority of directors of such entities, including small entities, are interested in providing customer feedback to HUD; response rates have been very high.

A6 Consequences of Less Frequent Data Collection

The data collection is designed as a follow-up to two previous studies and is needed to track changes in HUD partner satisfaction with Department performance. Without the follow-up survey, HUD lacks an important scientific and systematic basis for evaluating changes in customer satisfaction over time.

A7 Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public--General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

A8 Consultations Outside the Agency

Prior to conducting the 2001 and 2005 HUD partner surveys, consultations were held with representatives of organizations that represented most of the partner groups. Their purpose was to seek ideas for questions that might be asked related to HUD's service to and relationships with these groups. The questionnaires that were developed in 2001 and 2005 took into account suggestions and ideas offered as a result of these outside consultations and are carried over to the 2009 survey.

For the 2009 survey (as well as for the 2001 and 2005 surveys), pre-tests were conducted as part of the consultation process. A small (randomly selected) number of pre-test respondents were asked to complete the survey questionnaire and, then, participate in a debriefing consultation to determine if, in their judgment, the questions were relevant, appropriate, and understandable, and if the survey format was user friendly and efficient. In addition, since the FHIP partner survey is new to the 2009 survey administration (not having been conducted in either 2001 or 2005), consultations were held with officials of several FHIP organizations to solicit their input with respect to issues that, in their judgment, should be specifically covered in the FHIP survey.

A9 Payments to Respondents.

Participants voluntarily agree to participate in this data collection and do not receive any payment.

A10 Arrangements and Assurances Regarding Confidentiality

For the survey to produce valid results it is essential that respondents know the information they provide about HUD's customer service will not be associated with their names, organizations, business, agencies or communities—i.e., that their customer service responses will be combined with all other customer service responses such that identifying information will not be disclosed to HUD or anyone else, or cited or reported in any way that could identify them. Respondents must be assured by the survey administrators that strict confidentiality procedures will be employed. HUD's authority to offer respondents such assurance derives from Section 502 (g) of the Housing and Urban Development Act of 1970 (Public law 91-609) (*12 U.S.C. 1701z-2*), which provides that,

The Secretary is authorized to request and receive such information or data as he deems appropriate from private individuals and organizations, and from public agencies. Any such information or data shall be used only for the purposes for which it is supplied, and no publication shall be made by the Secretary whereby the information or

data furnished by any particular person or establishment can be identified, except with the consent of such person or establishment.

During the survey operations period, Silber & Associates will be able to associate responses with respondents for quality control purposes, but such linkages will be separated when they are no longer operationally necessary. Prior to that, strict procedures will be in place to make certain such linkages are used only for survey management. All reporting of the customer survey data to HUD will involve aggregations such that no individual respondent or their organization, business, agency or community will be identified or identifiable. The data set provided to HUD will also not contain any identifying information (such as name, organization, business, agency, address or community of respondents) that could permit disclosure or identification of respondents—directly or by deductive inference.

A11 Sensitive Questions

The questions being asked are not considered sensitive. Sensitive questions are defined as those whose answers, if made public, could cause physical, mental, emotional, economic, or other harm to an individual.

A12 Estimate of Annualized Burden Hours

Exhibit 1 summarizes the sampling frames, survey samples, and projected number of respondents. The estimated response rates were derived from the results of the 2005 customer satisfaction survey. Exhibit 2 shows the estimated burden per respondent and for the project overall.

Exhibit 1

Respondent Group	Estimated 2009 Universe Size	Estimated Response Rate*	Projected Number of Completed Surveys*
Community Development Department Directors	1,104	82	905
Mayors/Local Chief Elected Officials	678	81	549
Public Housing Agency Directors	1,697	82	1,392
HPN Non-profit Organization Directors	94	92	86
FHAP Agency Directors	104	80	83
FHIP Agency Directors	120	80	96

*Based on response rates for the 2005 HUD partners' surveys.

Exhibit 2

Projected Number of Respondents	Total Per-Respondent In Minutes)	Total Annual Burden (in Minutes)	Total Annual Burden (in Hours)
3,111	16	49,776	830

A13 Estimated Recordkeeping and Reporting Cost Burden on Respondents

The cost burden to respondents (who are responding in their capacity as officials of the organizations in which they are employed) is the time required to respond to survey questions, which can be valued at the equivalent of the earnings of such persons for that amount of time. Based on the Bureau of Labor Statistics (BLS) *Occupational Outlook Handbook's* determination that the 2006 median annual earnings of local government operational managers was \$74,950 (with corresponding hourly earnings of \$36.03), the annualized "cost" burden on all respondents is estimated to be \$29,897; the equivalent "cost" per respondent for completing the 16-minute survey is estimated to be \$9.61. Alternatively, based on the BLS National Compensation Survey's determination that the 2007 mean hourly earnings of state and local government management and professional workers was \$67,792 (with corresponding hourly earnings of \$31.15), the annualized "cost" burden on all respondents is estimated to be \$25,852; the equivalent "cost" per respondent for completing the survey is estimated to be \$8.31.

A14 Estimated Cost to the Federal Government

The total contracted cost to the Federal Government for developing, administering, and reporting on the 2009 HUD partners customer satisfaction surveys is \$496,308.

A15 Reasons for Changes in Burden

This submission to OMB is a request for reinstatement of a previously approved collection for which approval has ended.

A16 Tabulation Plans

Immediately following completion of data collection, the survey administrator, Silber & Associates, will prepare a data set containing respondents' answers to each of the questions and some additional demographic information (such as community size,

size of housing authority, etc.) that derive from the sampling lists. The Urban Institute, under contract to HUD, in conjunction with its subcontractor, Silber & Associates, will analyze the survey data. The Urban Institute will have primary responsibility for the preparation of the research report, with Silber & Associates preparing histograms and other visual displays for the report. A report and data set (minus any personal identifiers or demographic information that could, through inference, connect responses to respondents) will be delivered to HUD approximately four months after the data collection ends.

Although the six groups being surveyed are major HUD partners, collectively they do not cover all of the partner groups with which HUD associates. Moreover, their relationship with the Department varies considerably with the programs and program areas with which they are involved. It is not appropriate, therefore, to combine them into a single "partners" group for analytic purposes. Accordingly, each partner group will be analyzed separately, with comparisons among them one of the objectives of that analysis.

Analyses will be primarily descriptive in nature. Each partner group's current level of satisfaction with various aspects of its relationship with HUD will be presented for 2009 and compared with similar data from the 2005 partner surveys. This will permit assessment of changes that have occurred. Appropriate tests of statistical significance of differences will be used. In addition, results for each partner group will be cross tabulated by such factors as frequency of partner contact with HUD, years of interaction with HUD, agency size, field office size, and whether respondents perceive their relationships with HUD as involving primarily regulation or a combination of regulation and support.

Reports will consist of the following:

- **A main report**—comparing all six partner groups on all of the question items for which comparison is possible. It will contain an executive summary, an explanation of who HUD's partners are and the role they play, and why HUD is surveying such partners, and the results of the surveys with verbal description, pictorial and numeric presentation of results, and explanations where possible.
- **Six individual partner group data binders**—presenting survey responses for the respective groups cross tabulated by such factors as size of organization/ agency, size of HUD field office dealt with, frequency of interaction with HUD, and years of experience with HUD. Each will contain a description of the respective partner group and survey highlights.

- **As many as 81 individual field office-level data binders**—presenting survey responses by partner group for each field office compared to national aggregate responses. Data binders will not be prepared in cases where the number of respondents is fewer than 10; in such cases, responses will be combined at the Regional Office level.

A17 Expiration Date Display Exemption

Any reproduction of the data collection instrument will prominently display the OMB approval number and expiration date.

A18 Exceptions to Certification

This submission, describing data collection, requests no exceptions to the Certificate for Paperwork Reduction Act (5 CFR 1320.9).