

Supporting Statement for US Army Corps of Engineers Request for Approval to Conduct Regulatory program Customer Surveys

A. Justification

1. In compliance with Executive Order 12862 (FY95)'Setting Customer Service Standards' the US Army Corps of Engineers (Corps) began conducting annual surveys to assess the quality of services delivered to its Regulatory Program customers. This application requests an extension of OMB Approval of that data collection effort (ref OMB Control # 0710-0012).
2. The Corps will conduct surveys of customers served by our district offices, currently a total of 38 offices. Only voluntary opinions will be solicited and no information requested on the survey instrument will be mandatory. The survey form will be provided to the public when they receive a regulatory product, primarily a permit decision or wetland determination. The information collected will be used to assess whether Regulatory business practices or policies warrant revision to better serve the public. Without this survey the Corps would have to rely on less structured, informal methods of obtaining public input. The questionable scientific validity of such anecdotal data is well understood by this agency. Employment of a uniform data collection process will produce reliable information so that customer satisfaction may be measured across all districts. The ongoing administration of the survey allows Corps managers to monitor trends in customer satisfaction which serve as leading indicators of declining or improving delivery of Corps Regulatory services.
3. To ensure the highest response rate possible, customers will be given the choice of providing responses by hard copy or electronically. A hard copy of the survey will be provided. The hard copy will include a website so respondents can submit feedback via a web-based version of the survey if desired. The web-based version may be perceived as less burdensome by some customers. Although since the survey is very short and includes return address and postage the reduction in burden may not be viewed as significant. Survey responses will be transmitted (by mail/electronically) to a centralized Corps Headquarters database.
4. Corps Headquarters developed the survey in concert with district and division offices and will widely publicize a requirement to use this survey instrument nationally to avoid any duplication of effort among districts. No local regulatory survey will be developed or used in lieu of this survey.
5. The survey may be distributed to small businesses since these businesses comprise a subgroup of the population of Regulatory customers. It is important to include the entire population of customers to ensure they all have the opportunity to provide their feedback and have an influence on Corps services. As the form is completely voluntary and will take 15 minutes or less to complete, it should not be considered to be a burden on small businesses. The survey items solicit opinions concerning the quality and timeliness of services received. None of the questions require any need to refer to other documents or

otherwise obtain any information from another source. As the Corps is cognizant of the need to minimize burdens on small businesses as well as the public in general, the number of questions has purposely been kept small.

6. Without conducting this survey the Corps cannot comply with Executive Order 12862 or otherwise obtain reliable data to evaluate customer satisfaction with regulatory services. The survey must be administered throughout the year to ensure all major groups of customers are represented. This is due to the nature of the delivery of regulatory services *i.e.*, the customer base varies widely across each year and each regulatory action typically involves only one short-term interaction with customers.

7. There are no special circumstances that apply to this collection.

8. Publication in the Federal Register took place on 20 June 2005 in Volume 70, Number 117, page 35414 to solicit comments from the public for consideration. No comments have been received. Additionally, consultation with others outside the Corps concerning the administration and results of this data collection effort will take place.

9. There will be no payments to respondents.

10. The identities of respondents will be protected. In fact, providing name and address information on the survey is strictly optional. The survey form explicitly states that no respondents will be identified by name or organization in any report of the results of the survey.

11. There are no questions of a sensitive nature on the survey form.

12. The hourly burden is estimated at 15 minutes per response. A maximum of approximately 60,000 annual responses are anticipated nationwide. This estimate represents 60% of the 100,000 persons or organizations who receive regulatory decisions. Since these customers often feel the requirement to comply with federal laws on their property is an imposition, they often have strong opinions. Therefore, a large proportion is expected to respond to the survey. The annual burden for each of the next three years is expected to be 15,000 hours ( $60,000 \times 0.25$  hours) per year. Cost to respondents is estimated using the current mean wage rate of \$17.75/hour (Bureau of Labor & Statistics Aug 2004). The total annual cost is \$266,250 ( $15,000 \text{ hours} \times \$17.75/\text{hr}$ ). There will be no other costs to respondents beyond their time. Only one survey form will be used.

13. There will be no other costs imposed on respondents or record keepers.

14. We estimate the total annual cost to the federal government will be approximately \$107,431. It is assumed that each Corps district will assign one GS-12 to locally administer the survey for a total of 40 hours over the 12 month period. Headquarters will assign one GS-13 statistician to perform the statistical analyses and reporting of results for one 240-hour period in one year. Hourly rates of \$50.98/hour for the GS12 and \$62.42/hour for the GS13 were used. District survey costs will total \$77,490 (38 districts

\* \$50.98/hour \* 40 hours). Headquarters cost include the GS 13 cost of \$14,981 (\$62.42/hr \* 240 hours) One Information Technology (IT) programmer will be used to design the web-based version of the survey and to manage the centralized database. IT services are estimated at 80 hours, \$62/hour for a total IT cost of \$4960. Printing and mailing costs are estimated at \$10,000. Hence the total annual Federal cost is \$107,431

15. Adjustments to the previous application were made in two areas. 1) Previous submissions did not provide estimated cost of respondents' time to complete a survey. 2) Wage rates for Corps employees were adjusted to reflect current rates. There is no change in the burden. This is an extension of a previously approved collection.

16. There are no plans to publish the results of the survey. A professional statistician will perform the statistical analysis and reporting of results to assess problem areas in the Regulatory Program. The process will begin when the first survey is distributed following completion of a regulatory action (e.g. permit, wetland determination). Each completed survey will be transmitted (by mail or electronically) to a centralized database for analysis and reporting. The statistical summary of results will be distributed to all participating districts and divisions.

17. OMB form expiration date will be displayed.

18 There are no exceptions to the Certification for Paperwork Act Submissions.

#### B. Collections of Information Employing Statistical Methods

Statistical sampling methods will not be used. However, there will be a statistical analysis of the results. Only by executing a nationwide information collection effort can programmatic problem areas be identified for correction.