July 14, 2010

Supporting Statement for Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0102

Title: Federal Emergency Management Agency Housing Inspection Services Customer Satisfaction Survey

Form Number(s): FEMA Form 007-0-1 (formerly FEMA Form 86-26)

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 12862, *Setting Customer Service Standards*, signed on 9/11/1993 requires all executive departments and agencies that provide significant services directly to the public shall provide those services in a manner that seeks to meet the customer service standard established herein and shall take the following actions:

- Identify the customers who are, or should be served by the agency
- Survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services
- Post service standards and measure results against them
- Benchmark customer service performance against the best in business

- Survey front-line employees on barriers to, and ideas for, matching the best in business
- Provide customers with choices in both the sources of service and the means of delivery
- Make information, services, and complaint systems easily accessible
- Provide means to address customer complaints

In compliance with the FEMA Housing Inspection Services contract inspectors meet with applicants in designated federally declared disasters areas to verify personal information and assess dwelling damage. This survey will collect responses to questions about different aspects of the housing inspection process regarding the time commitment for the inspection, how the respondent felt about the inspection procedure and the overall level of satisfaction with the inspection process.

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.

Federal Emergency Management Agency Housing Inspection Services Customer Satisfaction Survey, FEMA Form 007-0-1 accompanied with the Cover Letter is used to survey individuals who have contacted FEMA for disaster assistance. FEMA Inspection Services Managers and Task Monitors use the survey results to measure disaster inspector customer service and make improvements to disaster services that increase customer satisfaction and inspection program effectiveness. The information is shared with Regional staff specific to the federal declaration for which the survey is conducted to further assist in enhancing customer service to those affected by disasters and other incidents that result in a declaration.

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 Housing Inspection Services Customer Satisfaction Survey is currently 100% paper-based, and is administered through paper mailings to the intended person. Mail in surveys are used. As part of the current work on the revision to the contract which is in place for this collection, consideration is being made to allow for electronic access to the survey to allow for online responses.

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 proposed survey is not available from any other source as it is unique to the inspection process.

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.

This information collection does not have an 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.

If FEMA's customer service surveys were not conducted, the consequences would be the absence of documentation of customer satisfaction for each disaster operation, a vital tool for policy review and measurement of operational performance. If FEMA could not survey the level of customer satisfaction for disaster operation in a timely manner, we would not be able to identify its 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:

The special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

(a) Requiring 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.

(c) Requiring respondents 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.

(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.

(f) Requiring the use of a statistical data classification 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.

(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.

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 May 27th, 2010, Vol. 75, No. 102, pp. 29779. No comments were received. See attached copy of the published notice included in this package.

A 30-day Federal Register Notice inviting public comments was published on August 9th, 2010, Volume 75, No. 152, pp. 47823. No comments were 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.

FEMA consults with J&E Associates, Inc., a professional services and management consulting firm, on the Housing Inspection Services Survey. Consultations are as often as weekly during the survey collection process as this contractor conducts the full survey collection for us and we consult with them on an as needed basis on questions that arise weekly or as needed.

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.

FEMA Inspection Management Task Monitors review the comments provided from responding applicants. The qualitative and quantitative information gathered from the open-ended questions in the survey serve as the driving force for any changes FEMA Inspection Management may need. For example, the last question in the customer satisfaction survey instrument is “Please provide any ideas to improve the process” and to outline “any unmet expectations,” and such questions serve as regular and direct consultation from the respondents to us regarding the survey.

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

FEMA does not provide payments or gifts to respondents in exchange for a benefit sought.

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

A Privacy Threshold Analysis (PTA) is currently being reviewed by the FEMA Privacy Office to determine if a Privacy Impact Analysis is required. The PTA was submitted to the FEMA Privacy Office on 5-6-2010.

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 sensitive nature.

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.

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. NOTE: The wage-rate category for each respondent must be multiplied by 1.4 and this total should be entered in the cell for "Avg. Hourly Wage Rate". 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.

Estimated Annualized Burden Hours and Costs								
Type of Respondent	**Form Name / Form Number**	**No. of Respon-dents**	**No. of Respon -ses per Respon -dent**	**Total No. of Responses**	**Avg. Burden per Response (in hours)**	**Total Annual Burden (in hours)**	**Avg. Hourly Wage Rate**	**Total Annual Respondent Cost**
Individuals in Households	Federal Emergency Management Agency Housing Inspection Services Customer Satisfaction Survey /FEMA Form 007-0-1 (formerly FEMA Form 86-26)	10,164	1	10,164	.25 (15 minutes)	2,541	$28.45	$72,291.45
Total		**10,164**		**10,164**		**2,541**		**$72,291.45**

Note: The estimated annual number of respondents for all disasters is 10,164 which is derived from the estimate of 33 annual disaster declarations that result in housing inspections based on the average number of disasters that occurred during FY2008-2009 that resulted in housing inspections and number of actual respondents according to the sample size of 950 and a 32.4% of response rate (950 x 0.324 = 307.8, therefore 308 respondents multiplied by 33 disasters = 10,164). Average hourly wage rate = $20.32 x 1.4 wage rate multiplier= $28.45.

- Note: The "Avg. Hourly Wage Rate" for each respondent includes a 1.4 multiplier to reflect a fully-loaded wage rate.
- "Type of Respondent" should be entered exactly as chosen in Question 3 of the OMB Form 83-I

According to the U.S. Department of Labor, Bureau of Labor Statistics website (www.bls.gov) the wage rate category for all occupations is estimated to be 28.45 per hour including the wage rate multiplier of 1.4, therefore, the estimated burden hour cost to respondents is estimated to be $72,291.45 annually.

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**
Total	0	0	0	0

There are no record keeping, capital, start-up or maintenance costs associated with this information collection.

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 **$5,259 average per survey task order* x 33 declarations per year**	$173,547
Staff Salaries** 1 GS 12 Step 2 employee, at 5% of their annual salary **for coordinating with the contractor for duties associated with this data collection such as reporting on areas that housing inspection can work on. ([77,368 x .05] = 3,868.40x 1.4= $5,415.76)**	$5,415.76
Facilities **[cost for renting, overhead, etc. for data collection activity]**	0
Computer Hardware and Software **[cost of equipment annual lifecycle]**	0

Equipment Maintenance **[cost of annual maintenance/service agreements for equipment]**	0
Travel	0
Printing	0
Postage **(Included in the contract cost of 4.47 per order)**	0
Other	0
Total	**$178,962.76**

* Multiple mailings are part of the follow up to collect data as part of the process and a task order can involve more than one survey per respondent in some cases.
** Note: The "Salary Rate" includes a 1.4 multiplier to reflect a fully-loaded wage rate.

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**
Federal Emergency Management Agency Housing Inspection Services Customer Satisfaction Survey /FEMA Form 007-0-1 (formerly FEMA Form 86-26)				2,652	2,541	-111
Total(s)				**2,652**	**2,541**	**-111**

Explain: There is a decrease in the burden hours requested in this submission. The values are lower in the last submission to OMB and because the number of annual disasters at that time was higher. It decreased from 34, the average upon last submission to 33, the current average. The number of disasters at the present submission is based on the average number of disasters that occurred during FY2008-2009 that resulted in housing inspections, and that average is 33. The response rate used is also slightly less based on tabulated results. It decreased minimally by .4% from 32.8% to 32.4%.

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**
Federal Emergency Management Agency Housing Inspection Services Customer Satisfaction Survey /FEMA Form 007-0-1 (formerly FEMA Form 86-26)	0	$72,291.45	+$72,291.45			
Total(s)	**0**	**$72,291.45**	**+$72,291.45**			

Explain: The cost for this collection was not previously on the OMB Inventory. The cost burden to respondents or record-keepers upon this submission is therefore a positive difference.

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.

The survey report contains descriptive summaries of disaster, survey sample and survey results for more focused questions, frequency distribution for customer satisfaction level, and customer comments stratified into 3 layers of satisfied, neutral and dissatisfied. The survey report for each disaster is distributed within FEMA. The normal schedule for survey projects is displayed in Table 4 below.

Table 5. Survey and report schedule.

Survey	Collection Start	Collection End	Report Expected
Housing Inspection Services Customer Satisfaction Survey	Approximately 21 days after declaration date	Approximately 45 days from start date	Approximately 60 days from start of collection
Semi-annual Summary Reports			June 30th September 30th

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".