

**Supporting Statement for
Paperwork Reduction Act Information Collection Submissions
OMB Control No.: 1090-0008
“American Customer Satisfaction Index (ACSI) E-Government
Website Customer Satisfaction Surveys”**

Terms of Clearance: None

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 statistical methods are used, 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.**

We are requesting a three-year extension of the generic clearance to conduct customer satisfaction surveys of federal government websites utilizing the methodology of the American Customer Satisfaction Index (ACSI) [see supplementary documents ACSI Methodology Paper –Merz Paper]. An extension will allow for continued use of a data-driven and statistically valid approach to understanding customer satisfaction with agency websites, which are playing a strategic role of ever-increasing importance. The ultimate objective is to help agencies become more citizen-centric and achieve higher levels of citizen trust and confidence.

An early law that supports these efforts is the Government Performance and Results Act of 1993, 31 U.S.C. 1116, which has as one of its purposes “improve Federal programs effectiveness and public

accountability by promoting a new focus on results, service quality, and customer satisfaction.” Such an initiative is also widely supported by longstanding administrative policy, as expressed in two Executive Orders, described below.

Official policy on customer service standards is contained in [Executive Order 12862, Setting Customer Service Standards](#), which establishes that Federal Government agencies should survey customers to determine their level of satisfaction with existing services, measure customer service satisfaction results against service standards, benchmark customer service performance against the best in business, provide customers with choices in both the sources of service and the means of delivery, make complaint systems easily accessible, and provide means to address customer complaints. Agencies are to utilize information about their customer satisfaction results in judging the performance of agency management and in making resource allocations.

Much more recently in January 2009, the Obama Administration released a memorandum to all Executive Departments and Agencies calling for the creation of a more transparent, participatory, and collaborative Government. The memorandum notes that Executive departments and agencies should solicit public feedback to identify information of greatest use to the public, determine how to best increase and improve opportunities for public participation in Government, and assess and improve the level of collaboration and cooperation between Government and nonprofit organizations, businesses, and individuals in the private sector. The Chief Technology Officer, General Services Administration, and OMB were charged with coordinating efforts to produce an Open Government Directive that would address specific actions for implementing the principles of a transparent and open Government. Use of ACSI surveys to provide reliable and statistically sound information directly supports improved performance, enhanced citizen involvement, openness and accountability.

The [GPRA Modernization Act of 2010](#) enhances the federal government's performance management by creating two new frameworks: 1) one government-wide performance plan developed by OMB with input from departments and agencies, and 2) agency priority goals that are identified and reported quarterly. GPRA 2010 tasks the agency Chief Operating Officer and Performance Improvement Officer with the overall organization management to improve performance.

On April 27, 2010, President Obama issued an [Executive Order Streamlining Customer Service Delivery and Improving Customer Service](#). This E.O. requires each agency to develop a customer service plan in consultation with OMB that addresses how each agency will provide

services in a manner that streamlines service delivery and improves the experience of its customers. The E.O. requires the establishment of mechanisms to solicit customer feedback on Government services and using feedback regularly to make improvements. Furthermore, the E.O. requires improving the customer experience by adopting proven customer service best practices across service channels (including websites) as well as identifying ways to use innovative technologies to accomplish customer service activities, thereby lowering costs, decreasing service delivery times and improving the customer experience (as can be accomplished through agency websites).

The Obama Administration clearly recognizes that while federal resources need to be allocated to programs and managers that deliver results, agencies need to engage and collaborate with the public to ensure that programs are structured in a way that maximizes effectiveness and strives to improve program quality. Therefore, agencies are likely to make more use of information collections involving citizen input and perspectives—like ACSI surveys—in order to collaborate effectively with the public and meet Administration mandates. In addition to its role as the international “gold” standard for assessing and benchmarking customer satisfaction, an ACSI survey is also the perfect tool for agencies to use in demonstrating their willingness to be open and collaborative, as they solicit input and feedback on the widest possible array of government activities and information.

The advantages of ACSI surveys are many and include most notably achieving statistical significance with minimum cost and burden on agencies and the public. Collecting, analyzing, and acting upon customer satisfaction data are vital to the government’s ability to achieve its E-Government strategy, including the consolidation of websites and reduction in the overall number of websites.

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. [Be specific. If this collection is a form or a questionnaire, every question needs to be justified.]

During the past three years, the generic clearance has been critical to the ability of agencies and their web teams to:

- Better identify who is visiting their websites.
- Determine what drives visitor satisfaction.
- Understand the relationship between visitors’ satisfaction with their experience and future behaviors.
- Prioritize resource allocation based on their ability to drive Return on Investment.
- Measure customer satisfaction continuously.

- Benchmark performance against public and private sector websites with a similar mission.
- Identify areas for improvement.
- Quantify the impact of improving visitor satisfaction on future behaviors.
- Drill down to evaluate satisfaction of different user groups and various sections of their websites.

In addition, the generic clearance has enabled the [Federal Consulting Group](#) of the U.S. Department of the Interior to provide the general public and policymakers in the Executive, Legislative, and Judicial Branches with data reporting on trends in overall customer satisfaction with federal government websites, as well as other insights into citizen behaviors and website usage.

Since the generic clearance was issued, approximately 225 websites have adopted the ACSI as a research tool and customer satisfaction metric. Agencies have been able to utilize the data from this research to guide their website redesign and improvement efforts with a greater and entirely appropriate focus on customer needs and desires, and many agencies have reported on their successes and lessons learned.

As previously described, the website customer satisfaction measures or surveys are based on the methodology of the ACSI. The ACSI is the only internationally recognized cross-industry, cross-agency methodology for obtaining comparable measures of customer satisfaction. In a competitive procurement, the FCG selected [ForeSee, Inc](#), which uses a unique website customer satisfaction measurement survey and model that employs the ACSI methodology. This survey and related analysis and reporting enable agencies to obtain insights that help make valuable resource allocation decisions based on customer feedback. ForeSee utilizes the proprietary methodology behind the ACSI econometric model to link the drivers and consequences of satisfaction. An important advantage, in contrast to methods that rely solely on survey questions, is that it produces results with statistical stability and low chance variation. This helps ensure uniform and consistent results that allow cross-agency comparisons and benchmarking.

ForeSee was initially a joint venture between Compuware, a software development and professional services company, and the CFI Group USA, LLC, an international leader in assessing and understanding customer satisfaction. Dr. Claes Fornell, the Donald C. Cook Professor of Business Administration at the University of Michigan and creator of the ACSI, founded the CFI Group in 1988. Along with other economic objectives – such as employment and growth – the quality of output (goods and services) is important to living standards. Like other

objectives, the quality of goods and services should be subjected to systematic and uniform measurement. This is the rationale for the ACSI. In the most general sense, the ultimate purpose of the ACSI is to help improve the quality of goods and services available to American citizens, regardless of whether they come from the public or private sectors. The benefits to government agencies in using the ACSI for customer satisfaction measures are:

- Reliance on the only national uniform and scientifically established measure of customer satisfaction.
- Confidence in having the most accurate and researched index of customer satisfaction available.
- Capability to benchmark against other agencies as well as private sector companies.
- Information on how to improve website satisfaction.
- Impartiality, objectivity, and stature of a leading consulting company and the world's leading non-profit organization for customer satisfaction: the American Customer Satisfaction Index (ACSI).
- High quality of data.
- Ability to measure customer satisfaction continuously.

In 1999, the federal government selected the ACSI to be a standard metric for agency evaluation of customer satisfaction. Since December 1999, the American Customer Satisfaction Index has published annually a [national index of customer satisfaction with federal government services](#). Beginning in September 2003, ForeSee has published [quarterly E-Government scores](#) for websites that participate in the ACSI. In 2008, 2009 and 2010, the Federal Consulting Group and CFI Group partnered to produce the first Government Call Center Satisfaction Index. The Federal Consulting Group is the executive agent for the ACSI in the federal government and offers the ForeSee web survey tool to federal agencies on an annual subscription basis.

All data for the website surveys is collected on-line, and the agencies receive access to their data and related reports 24/7 via a sophisticated on-line portal. This portal provides accurate and actionable information that enables agency web teams and managers to focus time, energy, and resources on areas that matter most to their web customers. A brief survey made up of a combination of standard and custom questions is triggered randomly for the smallest possible percentage of site visitors needed to achieve statistically valid information. The survey continuously and unobtrusively gathers information from agency website visitors about their overall satisfaction with the agency's site, satisfaction with specific site elements, and their likelihood to return to, recommend, or transact with the agency site in the future. All reporting and data storage are done through secure servers that reside at the ForeSee site so that agency site

performance is not affected. In addition, aggregate data on government website satisfaction is maintained and available for comparative purposes.

A description of the questionnaire's key questions and elements is provided below, including the supporting rationale.

Questionnaire

Questions	Supporting Rationale (See Pages 7 – 17 in the attached ACSI methodology paper)
<p>WEBSITE ELEMENTS THAT DRIVE SATISFACTION [QUESTIONNAIRE TYPICALLY CONTAINS 4-7 ELEMENTS]</p> <p><i>Content (1=Poor, 10=Excellent, Don't Know)</i> Please rate the accuracy of the information on this site Please rate the quality of information on this site Please rate the freshness of content on this site</p> <p><i>Functionality (1=Poor, 10=Excellent, Don't Know)</i> Please rate the usefulness of the features provided on this site Please rate the convenience of the features on this site Please rate the variety of the features on this site</p> <p><i>Look and Feel (1=Poor, 10=Excellent, Don't Know)</i> Please rate the visual aspect of this site Please rate the balance of graphics and text on this site Please rate the readability of pages on this site</p> <p><i>Navigation (1=Poor, 10=Excellent, Don't Know)</i> Please rate how well the site is organized Please rate how well the site layout helps you find what you are looking for Please rate the number of clicks to get where you want on this site</p> <p><i>Online Transparency (1=Poor, 10=Excellent, Don't Know)</i> Please rate how thoroughly this website discloses information about what the organization is doing Please rate how quickly organizational information is made available on this site Please rate how well information about this organization's actions can be accessed by the public on this site</p> <p><i>Search (1=Poor, 10=Excellent, Don't Know)</i> Please rate the relevance of search results Please rate the organization of search results Please rate how well the search results help you decide what to select Please rate how well the search feature helps you narrow the results to find what you want</p>	<p>These questions focus on the key elements that determine the user experience when they visit the website and are the drivers of customer satisfaction.</p> <p>Note: <i>Search</i> is not measured if <i>Functionality</i> element is measured and vice versa</p>
<p>AMERICAN CUSTOMER SATISFACTION INDEX QUESTIONS [ALL THREE ARE ASKED]</p> <p>What is your overall satisfaction with this site? (1=Very Dissatisfied, 10=Very Satisfied)</p>	<p>These are the core questions of the ACSI methodology.</p> <p>The overall satisfaction question is one of the key manifest variables</p>

Questions	Supporting Rationale (See Pages 7 – 17 in the attached ACSI methodology paper)
<p>How well does this site meet your expectations? (1=Very Dissatisfied, 10=Very Satisfied)</p> <p>How does this site compare to your idea of an ideal website? (1=Not Very Close, 10=Very Close)</p>	<p>and is used to measure satisfaction as a latent variable. (See paragraph 1 on page 16.)</p> <p>The second question in the index focuses on confirming/disconfirming customer expectations as a result of their experiences with other websites. (See paragraphs 2 and 3 on page 12.)</p> <p>This question focuses on the performance of the website observed by the customer versus his/her ideal website. (See paragraph 1 on page 16.)</p> <p>This question is integral to the approach used in the ACSI methodology and has been thoroughly tested and peer reviewed in terms of both the question wording and the scale anchors employed.</p>
<p>FUTURE BEHAVIOR QUESTIONS [MOST QUESTIONNAIRES HAVE 3-5 OF THESE QUESTIONS]</p> <p><i>Likelihood to return (1=Very Unlikely, 10=Very Likely)</i> How likely are you to return to this site?</p> <p><i>Recommend Site (1=Very Unlikely, 10=Very Likely)</i> How likely are you to recommend this site to someone else?</p> <p><i>Recommend Organization (1=Very Unlikely, 10=Very Likely)</i> How likely are you to recommend this organization to someone else?</p> <p><i>Confidence (1=Not At All Confident, 10=Very Confident)</i> Please rate your confidence in this organization</p>	<p>These questions focus on a desired outcome/future behavior and function as indicators of the consequence of satisfaction. (See paragraph 4 on pages 16-17.)</p>

<p style="text-align: center;">Questions</p>	<p style="text-align: center;">Supporting Rationale (See Pages 7 – 17 in the attached ACSI methodology paper)</p>
<p>FUTURE BEHAVIOR QUESTIONS (CONTINUED)</p> <p><i>Trust(1=Not at all Trustworthy, 10=Very Trustworthy)</i> Please rate you level of trust in this organization</p> <p><i>Share Content (1=Very Unlikely, 10=Very Likely)</i> How likely are you to share content (like a video or article) from this website by linking it to a social network site (Facebook, Twitter, LinkedIn, etc.)</p>	
<p>DEMOGRAPHIC QUESTIONS [AGE, EDUCATION, ETHNICITY, HOUSEHOLD INCOME LEVEL, AND GENDER DEMOGRAPHIC QUESTIONS] QUESTIONNAIRES TYPICALLY HAVE 3-5 OF THESE QUESTIONS</p>	<p>Demographic questions are often useful to further analyze the responses of various subgroups within the population.</p>

- 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 [and specifically how this collection meets GPEA requirements.]**

No other web survey instrument employs the patented methodology of the ACSI. Most other tools available to agencies measure activities such as numbers of page views, amount of time per visit to a website, percentage of website reliability, etc., but do not capture data on customer satisfaction. Moreover, most other customer satisfaction survey tools are not able to capture data on the customer experience both randomly and after the customer has visited sufficient web pages to render a reasonable evaluation of their experience.

- 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.**

Respondents for the web survey are selected at random and, typically, only after the website visitor has had a unique experience with the agency's website. For agencies with large numbers of visitors, it is unlikely that individual respondents will be selected to complete more than one random survey. There are no "special circumstances" as contemplated within item 7 of the "Certification Requirements for Paperwork Reduction Act Submissions." There are no situations where respondents would be required to: prepare a written response to the survey, submit more than an original and two copies of any document, or retain records for more than three years.

- 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 burden.**

The collection of information will not impact small businesses or other small entities as indicated in item 5 of OMB Form 83-I. If asked to participate in a survey, a small business could opt out very easily without penalty or pressure.

6. Describe the consequence 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.

Agencies that do not evaluate the customer satisfaction of their websites are at risk that:

- They might focus on the wrong measure of success – how well the website serves the agency’s needs instead of citizens’ needs.
- They will fail to be a truly citizen-centric electronic government that provides the best possible service and information to citizens as required by Executive Branch policy and directives.
- Citizens will benchmark agency website performance against the “best in business” and will not return to or recommend government websites that do not meet their expectations.
- They will not see productivity gains, necessary improvements and sufficient returns on their information technology budgets.
- Potential savings of doing government business via websites will not be realized, thus missing an important opportunity to reduce costs.
- Citizen satisfaction will decline which will lead to an overall reduction in citizen trust in government.

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 a 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 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 –**
- **requiring respondents to submit proprietary trade secrets, 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 –.**

The Federal Consulting Group ensures that all parties involved with conducting ACSI surveys collect information under this clearance in a manner that complies with 5 CFR 1320.5(d) (2). There are no special circumstances applicable to the above categories.

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 in response to the PRA statement associated with the collection over the past three years] 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 recordkeeping, 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.

This survey employs a methodology that was previously reviewed and approved by the Office of Management and Budget. It does not require respondents to submit proprietary trade secrets, or other confidential information, and does not include a pledge of confidentiality.

The Federal Consulting Group published a notice in the Federal Register [see attached Federal Register Notice document] on July 25, 2011, Volume 76, Number 142, Pages 44351 – 44352, as required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. No public comments were received.

Before beginning work on an ACSI website survey, FCG and the client agency review the specific information need. Based on an understanding of the agency's needs for the website, the questionnaire is prepared by survey experts and specific questions have been vetted with millions of websites visitors across many government and private sector websites. ACSI website surveys typically contain a total of about 25 questions and can be completed online in about 2.5 minutes. Visitors are randomly selected and asked to participate through a pop-up dialog box. Participation is entirely voluntary and only a small sample of visitors is even invited to participate.

More than 225 ACSI website surveys are currently being conducted by government agencies and more than 1 million citizens have completed a website survey over the last ten years. The public knows and trusts ACSI surveys and is generally enthusiastic about providing assessments and feedback on government services. The American people appreciate the fact these surveys are conducted by an independent third party, have statistical validity and are proactively used to improve services. Every ACSI website survey represents an opportunity for consultation with citizens. We use this opportunity to gather important information about their experience in taking an ACSI survey.

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

No payments or gifts will be made to respondents.

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

Individuals and organizations given the opportunity to take a survey will be assured of the anonymity of their replies under 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. Survey respondents will be advised on the survey form or in a privacy statement that participation is voluntary.

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.

This website survey will not ask questions or collect data of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. However, on occasion, some respondents may consider some of the standard demographic questions as sensitive in nature (e.g., questions that request the respondent's age, gender, education, or household income). Demographic questions are useful in segmenting the responses of different user groups or visitor profiles and are helpful in evaluating the results; therefore, respondents will be encouraged to answer these questions but assured that their participation is completely voluntary.

12. 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.**

The total respondent burden on the public of the ACSI website survey measurements during this three-year approval period is estimated to be 171,875 hours. The actual number of surveys is unknown at this time and will vary based on participation by federal agencies and as new websites are added or deleted. This estimate is based on our experience from the previous three-year approval period, as further explained in item 15. The projected estimates for fiscal years 2011-2013 are as follows:

2012. 225 Website Customer Satisfaction Measurements: The estimated burden for 225 website customer satisfaction measurements is estimated at 1,125,000 completed surveys, consuming 46,875 hours per year. This was calculated as follows: 5,000 respondents surveyed for each of 225 websites with a total of 2.5 minutes for each survey.

2013. 275 Website Customer Satisfaction Measurements: The estimated burden for 275 website customer satisfaction measurements is estimated at 1,375,000 completed surveys, consuming 57,292 hours per year. This was calculated as follows: 5,000 respondents surveyed for each of 275 websites with a total of 2.5 minutes for each survey.

2014. 325 Website Customer Satisfaction Measurements: The estimated burden for 325 website customer satisfaction measurements is estimated at 1,625,000 completed surveys, consuming 67,708 hours per year. This was calculated as follows: 5,000 respondents surveyed for each of 325 websites with a total of 2.5 minutes for each survey.

- **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.**

It is the general public that has generally used government services that will, in the main be responding to these surveys. Therefore, we have taken as the hourly rate for September, 2011, for all workers as \$23.09 per hour, as shown by Bureau of Labor Statistics data at <http://www.bls.gov/news.release/empsit.nr0.htm>. We have multiplied this hourly wage by a factor of 1.4 to include benefits, yielding an hourly rate of \$32.33. This figure, multiplied by the estimated 57,292 hours per year, yields a cost burden to the public of \$1,852,250.00. (The benefits multiplier is derived from BLS news release USDL: 11-1305, September 8, 2011, at <http://www.bls.gov/news.release/pdf/ecec.pdf>). .

13. Provide an estimate of the total annual [non-hour] 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 [including filing fees paid]. 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.**

There is no expected non-hour cost burden to respondents.

- **If cost estimates are expected to vary widely, agencies should present ranges 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.**

We have identified no reporting or recordkeeping “non-hour” cost burdens for this collection of information.

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 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.

The estimate of the total annual cost burden to the government resulting from the collection of information is estimated to be \$3,917,393 in 2012, \$4,629,661 in 2013 and \$5,341,893 in 2014, as explained below.

The estimate of the total annual cost burden to the Federal Government is expected to vary based on participation by federal agencies as new website measurement service is added or existing service is not renewed. However, the number of total websites measured is expected to increase each year. Unfortunately, we will not be able to account for the net effect of an ACSI website measure replacing survey work being performed by other contractors or utilizing internal staff resources.

The projected estimates for 2012-2014 are broken down as follows:

2012. 225 Website Customer Satisfaction Measurements (of which 50 are new website measures and 175 are repeat measures): The total annualized cost estimated for the Website Customer Satisfaction Measurement for 225 websites is \$3,917,393. This was calculated by adding the annualized capital/startup costs of \$712,268 with the total annual costs of \$3,205,125.

The annualized capital/startup costs were calculated based on the contribution of 0.1 of a full-time equivalent (FTE) at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 50 = \$712,268.

The total annual costs were calculated based on the contribution of 0.1 FTE at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 225 = \$3,205,125.

2013. 275 Website Customer Satisfaction Measurements (of which 50 are new website measures and 225 are repeat measures): The total annualized cost estimated for the Website Customer Satisfaction Measurement for 275 websites is \$4,629,661. This was calculated by adding the annualized capital/startup costs of \$712,268 with the total annual costs of \$3,917,375.

The annualized capital/startup costs were calculated based on the contribution of 0.1 of a full-time equivalent (FTE) at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 50 = \$712,268.

The total annual costs were calculated based on the contribution of 0.1 FTE at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 275 = \$3,917,375.

2014. 325 Website Customer Satisfaction Measurements (of which 50 are new website measures and 275 are repeat measures): The total annualized cost estimated for the Website Customer Satisfaction Measurement for 300 web sites is \$5,341,893. This was calculated by adding the annualized capital/startup costs of \$712,268 with the total annual costs of \$4,629,625.

The annualized capital/startup costs were calculated based on the contribution of 0.1 of a full-time equivalent (FTE) at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 50 = \$712,268.

The total annual costs were calculated based on the contribution of 0.1 FTE at the average GS-13, Step 3 for the Washington, D.C. area, \$94,969 per year X 1.4 multiplier for benefits X 0.1 FTE = \$14,245 per website X 325 = \$4,629,625.

The FTE annual salaries are based on the last rates published by OPM at <http://www.opm.gov/oca/11tables/pdf/DCB.pdf>. The benefits multiplier of 1.4 is derived from BLS news release USDL: 11-1305, September 8, 2011, at <http://www.bls.gov/news.release/pdf/ecec.pdf>.

[Please note that there are also Fees (\$31,000) that Federal Agencies pay to the Department for assistance with each website Survey Development and implementation. Therefore, the projected annual cost in 2012 is

\$31,000 X 225 = \$6,975,000, the projected annual cost in 2013 is \$31,000 X 275 = \$8,525,000, and the projected annual cost in 2014 is \$31,000 X 325 = \$10,075,000. However, these sums are not being counted in the cost to the Government, because they represent a transfer of funds from one Federal Government agency to another, and thus is not a net Federal cost.]

15. Explain the reasons for any program changes or adjustments.

We estimated that the respondent burden for the prior three years would be approximately 140,625 hours. That estimate was based on an expected participation of 200 websites in the first year of the clearance with growth of 25 additional websites each succeeding year. The overall rate of growth realized turned out to be less than expected due to limited agency funding and fewer agencies adding customer surveys on their websites. While the level of funding is uncertain going forward, the emphasis on e-government to reach citizens and commitment to performance measurement by both the legislative and executive branches of government will increase.

Based on this anticipated increase, we estimate that we will use 46,875 burden hours in year one, 57,892 burden hours in year two, and 67,708 burden hours in year three, for a three-year total of 171,875 hours. This is an increase of 31,250 burden hours from the previous three-year projection, reflecting a continuing emphasis on web services and use of new media, as well as requirements for performance measurement.

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.

Each agency that participates in the ACSI E-Government website survey has access to its ACSI scores and detailed statistical and analytical data through an on-line reporting portal maintained by ForeSee. While all agencies being supported receive monthly on-line reports, they also generally select a level of service involving a satisfaction research analyst provided by the contractor. This analyst prepares a detailed satisfaction insight review each quarter for review with the agency. This review of an agency website provides much greater statistical data, analysis, and trends about the satisfaction results. Recommendations for improvement are also an important part of each deliverable.

We intend to support quarterly publication of the ACSI E-Government website scores for participating websites, as well as a commentary analyzing government-wide trends.

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

To potentially increase the response rate by reducing the amount of introductory information, we request that we not be required to state the expiration date for OMB approval of the information collection in these survey instruments.

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

No exception to the certification statement is being requested.