Supporting Statement for Paperwork Reduction Act Submissions

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 of 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.

This information collection consists of a survey of users of the Department's Federal Housing Administration (FHA) primary contact center. It is designed to determine whether the Department is appropriately and adequately serving their needs. It follows HUD's commitment to use surveys to measure performance and changes in performance.

In addition to the importance HUD management places on the information provided by customers, the Federal Government mandates collecting this information through Executive Order (EO) 12862. This EO mandates that agencies survey their customers to identify the kind and quality of services they want their level of satisfaction with existing services.

FHA operates a contact center designed to provide program guidelines, insurance processing information, and consumer information. In order to evaluate the level of service that is provided to HUD/FHA clients the agency contact center management team requires the input of its clients on the performance of the customer service operation. This operation includes the contracted contact center agents, agency staff that support them, as well as the contact center self-service option available via a web-based frequently asked questions (FAQ) site. The survey includes three separate survey types:

- Internal Resolution: a five question survey to determine satisfaction with questions that required escalation from FHA Resource Center contract staff to agency staff for resolution.
- Escalated Resolution: a five question survey to determine satisfaction with questions that were resolved by contracted FHA Resource Center staff.

- Self-Service Resolution: a four question survey to determine satisfaction with questions resolved via the FHA Resource Center self-service internet site.

The users of the contact center include both housing industry professionals (lender underwriters, lender processors, appraisers, real estate agents, non-profits, etc.) as well as consumers (homeowners, renters, prospective homebuyers, etc.).

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.

The information will be utilized to determine the effectiveness of our customer service operations and tools. Client feedback is a significant portion of the evaluation of any contact center operation and will be utilized to identify areas for improvement, establish baselines of client satisfaction, and determine improvement or decline in service over time.

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.

Information collection will be done utilizing either an automated telephone based survey or via a web-based survey mechanism.   HUD's decision to utilize this method will ease the time burden on the client in the collection of the information, improve the accuracy of the survey responses, and improve the agency's ability to sort and report on the resulting survey data. The collection methods for the two types of electronic collection are provided below:

- The telephone based survey will be initiated randomly for callers to the contact center. If the client agrees to the survey request they will be transferred to an interactive voice response (IVR) survey that will collect only their responses to the survey questions and house those responses in an on-line database. No personal information will be collected from the client surveyed nor will there be any documentation or history related to the transfer of that caller into the IVR survey mechanism.
- The web based survey will be initiated randomly for those that seek information from the contact whether by telephone, email, or via our web-based FAQ site. A random selection of service requests will be selected each month and provided with an email requesting their consideration of a survey related to their recent service request. If the client agrees to the survey they will select a link from within the requesting email and be guided to a web-based survey tool. The responses to the survey questions are housed in an on-line database. The survey tool neither seeks privacy related information nor collects it within the survey mechanism.

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.

A review of the agency's approved customer service survey mechanisms was completed and existing mechanisms lacked the specificity necessary to achieve the goals outlined in Item 2 above.

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.

Respondents to this survey will include representatives of organizations and businesses that do business with HUD to provide services or benefits to end customers. These organizations and businesses consist of non-profit organizations and for-profit entities. As such, some respondents will be representatives of small for-profit businesses and small non-profit organizations. Sampling only a portion of the universe of such entities and establishing the voluntary nature of participation in this survey are all geared to minimize the burden, and perceived burden, on such entities.

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.

The data collection is designed to obtain feedback on the performance of the largest provider of information and technical support for FHA residential mortgage insurance programs. This feedback is essential to ensure that the agency is providing not only the highest level of customer service to our clients but to ensure that the nature and type of information being provided is adequate to support the agency's mission and programs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

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.

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.

N/A Included with Generic Collection

The Office of Single Family Housing convened a focus group of intended survey recipients in October 2011 to review the proposed survey instruments and provide feedback. The focus group consisted of a cross section of user types and provided feedback on all aspects of the survey instruments, data collection, and record keeping. Feedback from this focus group generated changes to expand the survey instrument from one comprehensive instrument to the three instruments currently contained in this request. Additional feedback provided input in the specific wording of survey questions, the content of the survey instructions and disclosure information.

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

N/A

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

The technology utilized to capture survey results (either via the IVR or Web-based survey options) does not collect or maintain any data specific to the individual respondent. This includes any telephone number, email address or IP address associated with the respondent's interaction with the technology. Respondent's will be notified prior to their initiation of the survey that no personal data of information will be captured or collected during the survey.

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.

N/A

12. Provide estimates of the hour burden of the collection of information.

Exhibit 1 summarizes the sampling frames, survey samples and projected number of respondents for each survey type. The estimated response rates were derived from testing of the survey instruments. Exhibit 2 shows the estimated burden per respondent and for the project overall.

Exhibit 1				
Respondent Group	Respondent Universe (Annual Volume of Resource Center Users)	Survey Sample (3% of Users)	Estimated Response Rate	Projected Number of Completed Surveys
Escalated Resolution	239,341	7,180	0.30	2,154
Internal Resolution	603,409	18,102	0.30	5,431
Self Service Resolution	34,420	1,033	0.30	310

Total	877,170			7,895

The hourly cost per response is based on the per capita income of the United States of $26,059 (US Bureau of the Census, 2010 American Community Survey) and the corresponding hourly earnings of $12.53; the total annualized cost for completing the survey is estimated to be $4,761.40.

Exhibit 2				
Number of Respondents	Total Burden per Respondent (Minutes)	Total Annual Burden Hours	Hourly Cost	Annual Cost
7,895	3	395	$12.53	$4,946.22

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

There are no additional costs to respondents.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The cost of the survey is an included cost in the overall Project Management contract item within the larger FHA Resource Center contract (*HUD Contract Number C-OPC-23389 – Single Family Client Management Center*). The agency anticipates no additional cost burden for the technology utilized, collection of data, project management, or report preparation.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new survey to be included under 2535-0116. The survey Customer Satisfaction with the FHA Resource Center will be the primary method for obtaining feedback from the contact center users. The primary focus of this survey is to assess customers’ satisfaction with their interactions with the FHA Resource Center and to assess changes in their satisfaction over time.

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.

Results from the survey will not be published. Data will be reported to the agency on a monthly basis for use in identifying and facilitating necessary changes to the contact center operations.

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.

N/A

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

No exceptions.

B. Collections of Information Employing Statistical Methods

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the Form OMB 83-I is checked, "Yes," the following documentation should be included in the Supporting Statement to the extend that it applies to the methods proposed:

1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Client Type of Incoming Service Request	Average Annual Incoming Service Requests	Escalated Resolution	Internal Resolution	Estimated Response Rate (3%)
Appraiser	31,839	16,843	14,996	955
Attorney	2,865	834	2,032	86
Auditor/CPA	1,112	228	884	33
Builder	2,773	937	1,835	83
Closing Agent	1,104	244	860	33
Congressional Staff	34	8	25	1
FHA	185	42	144	6
Gov - Federal	758	152	606	23
Gov - Local	396	83	313	12

Gov - State	455	88	367	14
Homebuyer	81,258	1,138	80,120	2,438
Homeowner	86,778	868	85,910	2,603
Housing Counselor	2,301	633	1,668	69
Inspector	1,441	453	989	43
Landlord	1,037	30	1,007	31
Lender Applicant	666	112	554	20
Lender Loan Officer	76,008	9,957	66,051	2,280
Lender Manager	48,669	14,747	33,922	1,460
Lender Processor	137,554	36,864	100,689	4,127
Lender Staff	69,780	23,516	46,264	2,093
Lender Underwriter	181,908	124,789	57,119	5,457
Non-Profit	1,846	389	1,456	55
Other	33,171	2,587	30,583	995
Real Estate Professional	42,239	5,449	36,790	1,267
Rehab Consultant	750	105	645	23
Renter	35,539	36	35,503	1,066
Trade Association	295	73	222	9

2. Describe the procedures for the collection of information.

Surveys will be conducted each month on a random selection of contact center users specific to each survey type. Surveys will be conducted during the month, typically between 24-48 hours from the date of service, to ensure that the respondent's interaction with the Resource Center is still fresh in their mind.

Potential participants will be randomly selected from a pool of eligible contact center users and will be offered all appropriate survey mechanisms. The chart below provides an overview of the survey type, pool of potential respondents and mechanism offered:

Respondent Group	Pool of Potential Respondents	Survey Mechanism Offered
Escalated Resolution	239,341	IVR and Web-Based
Internal Resolution	603,409	IVR and Web-Based
Self Service Resolution	34,420	Web-Based

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be

adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Potential survey respondents will be provided an opportunity to participate via a live interaction with a contact center agent (for IVR based surveys) or via the email address provided or confirmed in their most recent interaction with the FHA Resource Center (for web-based surveys). The immediacy of the survey should maximize the response rate by increasing the respondent’s understanding of the subject of the survey request (higher recognition rate) as well as reduce the possibility of a change in the respondent’s email address (higher delivery rate).

A true random selection of participants with the anticipated sample size should produce reliable data adequate for the intended purposes of this survey.

Respondent Group	Respondent Universe (Annual Volume of Resource Center Users)	Survey Sample (3% of Users)	Projected Number of Completed Surveys	Margin of Error
Escalated Resolution	239,341	7,180	2,154	2.2
Internal Resolution	603,409	18,102	5,431	1.4
Self Service Resolution	34,420	1,033	310	7.1

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

The Office of Single Family Housing convened a focus group of intended survey recipients in October 2011 to review the proposed survey instruments and provide feedback. The focus group consisted of a cross section of user types and provided feedback on all aspects of the survey instruments, method of collection, data collection, and record keeping. Feedback from this focus group did not generate any concerns with the method of delivery, the technology utilized to solicit and collect survey responses, or the burden necessary to access or complete the survey.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

David Dwyer, Housing Program Officer
600 East Broad Street
Richmond, VA 23219
(804) 822-8419