

**Supporting Statement for
Generic Clearance for the National Cemetery Administration, Customer
Satisfaction Surveys
(2900-0571)**

A. Justification

1. In response to Executive Order 12862, the National Cemetery Administration (NCA) will conduct surveys to determine the level of satisfaction with existing services among their customers. The surveys will solicit voluntary opinions and are not intended to collect information required to obtain or maintain eligibility for a VA program or benefit. Baseline data obtained through these information collections is to be used to validate customer service standards. This submission requests the Office of Financial Management and Budget (OMB) to:

a. Grant the organizations a three-year extension of its generic clearance approval authority;

b. Allow them to establish a maximum number of annual burden hours against which burden will be charged for each survey actually used; and

c. Allow for the submission of a summary of objectives, specific burden estimates, and all final survey instruments (focus group scripts, test questions, etc.) covered by the generic clearance from OMB (and inclusion in the OMB public docket) prior to their use.

2. The NCA will continue to conduct customer satisfaction surveys under this generic clearance to implement the Executive Order. If the surveys were not conducted, the organizations would be unable to comply with the Executive Order, and would not have the information needed to improve established standards for the best possible customer-focused service. They will use the information gathered to determine where and to what extent services are satisfactory, and where and to what extent they meet customer needs and expectation and are in need of improvement. Participation in the surveys will be voluntary and the generic clearance will not be used to collect information required to obtain or maintain eligibility for a VA program or benefit. In addition, voluntary customer surveys are not program evaluations and will not be used as substitutes for traditional program evaluation surveys that measure objective outcomes. In order to maximize the voluntary response rates, the information collection will be designed to make participation convenient, simple, and free of unnecessary barriers. The NCA anticipate the surveys will identify those aspects of services that are most important to their customers, the veteran. NCA requests that once approved by OMB, this generic ICR becomes a generic clearance that remains in place for the PRA's maximum approval period of three years. Individual surveys will be sent to OMB for clearance as individual information collections ("ICs") prior to collecting data. VA shall track the usage of all collections approved under this clearance including instruments, methodology, respondents, and total burden hours to ensure compliance

with the description of collections approved under this generic clearance. In the next submission of this collection to OMB for review, VA shall provide a summary report addressing all collection conducted under the generic during this approval. Surveys developed under this generic clearance number will contain questions similar to those that might be asked in the customer satisfaction surveys included in this initial Generic ICR package. Again, prior to use, each individual survey or IC will require a separate submission to OMB (through the generic IRC process, with a short OMB review) with the exact questions and with burden hours specified.

3. Information technology will be used wherever possible to reduce the information collection burden these activities place on the public. In most instances, surveys sent to NCA customers will be paper based. This customer requirement was derived through focus sessions with NCA customers. Customers (mostly elderly) felt that receiving a survey over the phone or electronically so soon after the death of a loved one would be insensitive, hurtful and impact on the grieving process. Using a paper survey ensured consistency in message and tone. Additionally, they noted that most NCA customers are elderly and do not have access to computers for electronic surveys.

4. The NCA will use VA's internal review process to examine each information collection to prevent duplication of effort or redundancy in information collected. No information currently being collected in VA can be used to meet the requirements of the Executive Order. The information to be gathered from the surveys as a whole is unique and not available from any other sources.

5. Small businesses, such as directors of funeral homes, are involved in this collection of information.

6. Most customer satisfaction surveys are recurring so that ongoing measures can be created to measure satisfaction and to determine how well the agency meets customer service standards. The burden consists only of that information which is essential to maintain the validity and accomplish the goals of the Executive Order. The NCA will use a variety of activities including focus groups and surveys to gauge customer perceptions of VA services as well as customer expectations and desires. The results of these information collections should lead to improvements in the quality of the NCA service delivery.

7. There are no special circumstances that require the collection of information to be conducted in a manner that is inconsistent with the guidelines in 5 CFR 1320.6.

8. The agency notice was published in the Federal Register on November 12, 2009 at pages 58373-58374. The notice solicited comments relating to the organizations' customer satisfaction survey proposals. No comments were received in response to this notice.

9. There are no plans to provide payments or gifts to respondents. However, participants in focus groups may be reimbursed for travel expenses.

10. The identities of individuals and organizations contacted will be carefully protected. Names and personal identifiers will be used to locate survey participants and will thereafter be stripped from any files kept for analysis purposes.

11. Questions of a sensitive nature will not be asked.

12. Estimate of the Respondent Burden:

Most customer satisfaction surveys will be recurring so that the National Cemetery Administration can determine how well the administration meets the requirements of its customer service standards. Each collection of information will consist of the minimum amount of information necessary to determine customer needs and determine how well NCA meets those needs. NCA expects to conduct 15 focus groups annually involving a total of 450 hours annually during the approval period. In addition, NCA expects to conduct mail surveys with a total annual burden of approximately 12,000 hours and will distribute Comment Cards with a total annual burden of 208 hours. NCA also plans to conduct mail surveys of customers that receive headstones or markers at private cemeteries and Presidential Memorial Certificates to determine levels of customer satisfaction and how well NCA meets the customer's needs and expectations. These customer surveys are estimated at 1000 burden hours annually during the approval period. All individual surveys or ICs will included a Paperwork Reduction Act (PRA) statement and burden estimates. When conducting focus groups, the focus group moderator will clearly provide this information to all participants.

I. National Cemetery Administration Focus Groups

National Cemetery Administration Focus Groups with Next of Kin (5 groups/10 participants per group/3 hours each session)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2010	50	150 hours	5 Groups Annually
2011	50	150 hours	5 Groups Annually
2012	50	150 hours	5 Groups Annually

National Cemetery Administration Focus Groups with Funeral Directors (5 groups/10 participants per group/3 hours each session).

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2010	50	150 hours	5 Groups Annually
2011	50	150 hours	5 Groups Annually
2012	50	150 hours	5 Groups Annually

National Cemetery Administration Focus Groups with Veterans Service Organizations
(5 groups/10 participants per group/3 hours each session).

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2010	50	150 hours	5 Groups Annually
2011	50	150 hours	5 Groups Annually
2012	50	150 hours	5 Groups Annually

II. National Cemetery Administration Visitor Comment Cards (Local Use)

National Cemetery Administration Visitor Comments Cards (2,500 respondents/5 minutes per card)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2010	2,500	208 hours	Annually
2011	2,500	208 hours	Annually
2012	2,500	208 hours	Annually

III. National Cemetery Administration Mail Surveys

National Cemetery Administration Next of Kin National Customer Satisfaction Survey
(Mail, 15,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2010	15,000	7,500 hours	Annually
2011	15,000	7,500 hours	Annually
2012	15,000	7,500 hours	Annually

National Cemetery Administration Funeral Directors National Customer Satisfaction Survey
(Mail, 4,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2010	4,000	2,000	Annually
2011	4,000	2,000	Annually
2012	4,000	2,000	Annually

National Cemetery Administration Veterans-At -Large National Customer Satisfaction Survey
(Mail 5,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2010	5,000	2,500 hours	Annually
2011	5,000	2,500 hours	Annually
2012	5,000	2,500 hours	Annually

IV. Program/Specialized Service Survey

National Cemetery Administration Headstone and Marker/PMC Survey (Mail, 6, 000 surveys/10 minutes each)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2010	6,000	1,000 hours	Annually
2011	6,000	1,000 hours	Annually
2012	6,000	1,000 hours	Annually

V. Total Burden Hours Per Year

<u>Year</u>	<u>Total Number of Respondents (all surveys)</u>	<u>Estimated Annual Burden</u>
2010	32,650	13,658
2011	32,650	13,658
2012	32,650	13,658

13. Estimated Cost to the Respondents. The total cost to the respondents is \$95,606. (13,658 x \$15.00 = \$204,870)

14. Estimated Cost to the Federal Government:

The estimated cost to the Federal Government of developing focus group moderator guides and holding focus session as outlined in this generic clearance is approximately \$6,500. The cost includes development time, staff travel costs and travel reimbursements for focus group participants.

The cost of developing, printing, distributing and analyzing and reporting the results of comment card surveys is approximately \$5,000 per year.

The internal administrative costs in developing, printing, mailing survey instrument (multi-step process), and in data analysis and reporting results for the National Cemetery Next of Kin, Funeral Director and At-Large surveys is approximately \$310,000 per year.

The internal administrative costs in developing, printing, mailing survey instruments and data analysis and reporting for National Cemetery Administration Headstone, Marker and PMC customer survey is approximately \$50,000 per year.

15. The burden hour increase is due to a change in the number of prospective survey participants.

16. The results obtained from these information collections will be disseminated to management officials, VA employees, and the public.

17. Survey instruments do not display an expiration date and if required to do so, would result in unnecessary waste of the existing stock. For this reason, VA continues to seek an exemption that waives the displaying of the expiration date.

18. There are no exceptions to the "Certification of Paperwork Reduction Act Submission."

B. Collections of Information Employing Statistical Methods

Overview:

All surveys will use statistical methods and will follow OMB guidelines. The organization will also follow the guidance in the OMB Manual, "Resource Manual for Customer Surveys." Technical survey expertise and statistical service will be sought from VA statisticians or from other Federal statistical agencies.

In general, all surveys will be based upon a detailed sampling plan that determines the sample size needed to yield valid data at the 95 percent confidence level, assuming a 60 percent response rate. All samples will be randomly generated.

To ensure NCA and VA are in compliance with Executive Order No. 12862, NCA conducted the voluntary Survey of Satisfaction with National Cemeteries since 2000. The survey's purpose and design were developed to determine the kind and quality of services customers of NCA wanted and their level of satisfaction with existing services. Since 2000, NCA followed the OMB generic clearance guidance established in the OMB guidance named Resource Manual for Customer Surveys Part 1, dated October 1, 1993. As a result, NCA continually identified its customer's needs, expectations and level of satisfaction of service in an effort to meet or exceed customer expectations, to improve service, and to be in compliance with Executive Order No. 12862. The annual

survey is administered to NCA's two major customer groups, next of kin and funeral directors.

To ensure that the questions in the survey were appropriate, addressed the needs of NCA's customers and provided NCA with valuable customer based information to improve customer satisfaction, NCA conducted focus groups to identify salient issues. As a result, a draft survey was developed and cognitive lab sessions were held to identify survey improvements. A national pretest was performed and the surveys were revised based on the findings.

The Survey of Satisfaction with National Cemeteries and the Survey of Satisfaction with Memorial Service Products and Services are paper based survey. The focus groups, the cognitive labs and the pretest demonstrated that next of kin respondents, having recently lost a loved one and still in a stage of grieving, found phone surveys intrusive during this sensitive time. As a result, the paper surveys were used out of respect for the mourning process. Additionally, surveys are never sent to a grieving next of kin until a minimum of 90 days pass. Again, this process was implemented to respect the grieving process.

National Cemeteries Administration Next of Kin, Funeral Directors and At-Large Customer Satisfaction Survey:

To administer the Customer Satisfaction Surveys with National Cemeteries in the least burdensome manner, a detailed sampling plan was developed that determined the sample size needed for each national cemetery to yield valid data at the 95 percent confidence level, assuming a 60 percent response rate. Two different approaches will be used that are dependent on the number of interments per year at each national cemetery.

For cemeteries with 400 or more interments per year, a representative random sample of next of kin will be drawn based on the required sample size needed to yield a valid respondent sample. The sample will be drawn from next of kin who visited the national cemetery over a 6-month period that fell three to nine months prior to the survey administration. This ensures that NCA does not survey next of kin until at least 90 days have past since they buried their loved one. Based on this approach, surveys will be sent to approximately 20,000 next of kin across cemeteries with 400 or more interments.

For cemeteries with fewer than 400 interments, the number of surveys returned needed to yield a valid sample at the 95 percent confidence level exceeds the population size, given a 60 percent response rate. Surveys therefore will be sent to the census of next of kin at these cemeteries. Based on this approach, surveys will be sent to approximately 5,200 next of kin across cemeteries with fewer than 400 interments in the year.

Across all cemeteries, surveys will be sent to approximately 7,500 funeral directors. For cemeteries with fewer than 260 unique funeral directors, surveys will be sent to a census of funeral directors. For cemeteries with more than 260 unique funeral directors, a representative random sample will be drawn based on the required sample needed to yield a valid respondent sample. The number of funeral directors needed was much lower than the number of next of kin needed because many funeral directors conducted multiple services at a national cemetery over the survey timeframe.

To maximize the response rate, a five-step mailing protocol will be used. It will consist of a prenotification letter; a copy of the survey with return envelop along with a cover letter; a reminder/thank you postcard; a second questionnaire to those who had not yet responded; then a final reminder/thank you postcard. Last year the five step process generated an overall response rate of 56.4%.

National Cemetery Administration Headstone and Marker/PMC Survey:

For surveys such the Survey of Satisfaction with Memorial Service Products and Services for customer that are buried in private cemeteries and receive government furnished headstones and markers or Presidential Memorial Certificates, NCA will also administer the survey in the least burdensome manner. NCA developed a detailed random sampling plan to determine the sample size needed to yield valid data at the 95 percent confidence level, assuming a 60 percent response rate. A random representative sample will be drawn from the two population groups – next of kin of deceased veterans that ordered a headstone or marker for installation at a private cemetery and the funeral directors that assisted in the process.

To secure the customer survey data from customers that received a government headstone and markers and the Presidential Memorial Certificates at a private cemeteries, NCA will use a three step mailing protocol. It will consist of a prenotification letter; a copy of the survey with return envelop along with a cover letter; and a reminder/thank you postcard. Used in prior surveys, this strategy provided timely accurate customer satisfaction information for NCA and provided the appropriate response rate.

Focus Group Information Collections:

All focus group participants will be selected using a random selection process that identifies next of kin or funeral directors that used NCA services at a specific National Cemetery location. Questions will be linked to customer service requirements to ensure that data received provides a clear link to the service provided NCA customers.

National Cemetery Visitor Comment Cards:

Comment cards will be used in instances where additional veteran feedback is needed to better understand customer requirements. Comment Cards in general will not provide statistically valid data as they are qualitative in nature. They will however provide additional insight into customer needs and requirements and service.