

## **SUPPORTING STATEMENT - PART A**

### **U.S. ARMY CORPS OF ENGINEERS CUSTOMER SERVICE SURVEY OMB CONTROL NUMBER: 0710-0012**

#### **Part A. Justification.**

##### **1. NEED FOR THE INFORMATION COLLECTION**

In compliance with Executive Order 12862 (FY95) 'Setting Customer Service Standards' the US Army Corps of Engineers (Corps) began conducting annual surveys to assess the quality of services delivered to its Regulatory Program customers. This application requests an extension of OMB Approval of that data collection effort (ref OMB Control # 0710-0012). The customer service survey was first approved in August of 2002.

##### **2. USE OF THE INFORMATION**

The Corps will conduct surveys of customers served by our district offices, currently a total of 38 offices. Only voluntary opinions will be solicited and no information requested on the survey instrument will be mandatory. The survey form will be provided to the public when they receive a regulatory product, primarily a permit decision or wetland determination. The information collected will be used to assess whether Regulatory business practices or policies warrant revision to better serve the public. Without this survey the Corps would have to rely on less structured, informal methods of obtaining public input. The questionable scientific validity of such anecdotal data is well understood by this agency. Employment of a uniform data collection process will produce reliable information so that customer satisfaction may be measured across all districts. The ongoing administration of the survey allows Corps managers to monitor trends in customer satisfaction which serve as leading indicators of declining or improving delivery of Corps Regulatory services.

##### **3. USE OF INFORMATION TECHNOLOGY**

To ensure the highest response rate possible, customers can be given the choice of providing responses by hard copy or electronically. A hard copy of the survey may be provided upon request. Almost all surveys are now completed electronically. The hard copy will include a website address so respondents can submit feedback via a web-based version of the survey if desired. The web-based version may be perceived as less burdensome by some customers. Although since the survey is very short and includes return address and postage the reduction in burden may not be viewed as significant. Survey responses will be transmitted (by mail/electronically) to a centralized Corps Headquarters database. The Corps is also investigating streamlining the choices and making this fillable on smartphones or tablets by including in an App and enabling small screen rendering. To do this effectively, the form may need to be revised (reduced length and questions). Any proposed revisions would be vetted with OMB prior to implementation.

##### **4. NON-DUPLICATION**

Corps Headquarters developed the survey in concert with district and division offices and will widely publicize a requirement to use this survey instrument nationally to avoid any duplication of effort among districts. No local regulatory survey will be developed or used in lieu of this survey.

##### **5. BURDEN ON SMALL BUSINESS**

The survey may be distributed to some owners of small businesses since these businesses comprise a subgroup of the population of Regulatory customers. It is important to include the entire population of customers to ensure they all have the opportunity to provide their feedback and have an influence on Corps services. As the form is completely voluntary and will take 15 minutes or less to complete, it should not be considered to be a burden on small businesses. The survey items solicit opinions concerning the quality and timeliness of services received. None of the questions require any need to refer to other documents or otherwise obtain any information from another source. As the Corps is cognizant of the need to minimize burdens on small businesses as well as the public in general, the number of questions has purposely been kept small.

## 6. LESS FREQUENT COLLECTION

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

## 7. PAPERWORK REDUCTION ACT GUIDELINES

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2). None of the special circumstances, as outlined in the supporting statement instructions, apply to this information collection. The timing of a submittal is dictated by the needs of the applicant, not on a quarterly or other basis, and is not associated with a statistical survey.

## 8. CONSULTATION AND PUBLIC COMMENTS

Publication in the Federal Register took place on 15 November 2013 in Volume 78, Number 221, page 68828 to solicit comments from the public for consideration. No comments were received.

## 9. GIFTS OR PAYMENTS

There will be no payments or gifts provided to respondents.

## 10. CONFIDENTIALITY

The identities of respondents will be protected. In fact, providing name and address information on the survey is strictly optional. The survey form explicitly states that no respondents will be identified by name or organization in any report of the results of the survey. To view the responses from the survey stored on a DoD server, a login and password are required.

## 11. SENSITIVE QUESTIONS

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

## 12. RESPONDENT BURDEN AND LABOR COSTS

The hourly burden is estimated at 15 minutes per response. A maximum of approximately 60,000 annual responses could be received nationwide (information is included in the 60,000 permit authorization letters sent to applicants). Since these customers often feel the requirement to comply with federal laws on their property is an imposition, they often have strong opinions. Responses are lower than expected and automation advances may help increase the ease to fill out the survey and will provide more responses. Last FY, we received approximately 1,000 electronic responses and few hundred hard copies. The annual burden for each of the next three years is expected to be 500 hours (2,000 responses\*0.25hours) per year. The 2,000 estimate includes more responses as technological advances make completion of the form easier. Cost to respondents is estimated using the current mean wage rate of \$22.01/hour (Bureau of Labor & Statistics 2012 rate for All Occupations). The total annual cost is \$11,005 (500 hours\*\$22.01/hr). There will be no other costs to respondents beyond their time. Only one survey form will be used.

Number of potential respondents: 2,000  
Number of anticipated annual responses: 2,000  
Responses per respondent: 1  
Average burden per response: 0.25 hours  
Annual burden hour: 500 hours  
Annual cost to respondents: \$11,055  
Total cost to respondents: \$11,055

### 13. RESPONDENT COSTS OTHER THAN BURDEN HOUR COSTS

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

### 14. COST TO FEDERAL GOVERNMENT

We estimate the total annual cost to the federal government will be less than approximately \$4,000. This accounts for the administration of the survey, compilation and providing responses to all districts (2 hours per month- \$31.78 mean wage rate for web developer) IT services are estimated at 80 hours per year, \$37.63/hour (computer programmer – BLS 2012 median wage rate) for a total IT cost of \$3,010. Printing and mailing costs are minimal as most districts post the link to the customer service survey in permit and jurisdictional determination letters and in email response to respondents. All district websites also contain a link to the online survey. Districts may mail a postage paid response forms to a few hundred respondents upon request (\$0.98 total - \$0.49 cents to send a letter (rate after 26 Jan) and return postage of \$0.49) for a total cost ~\$200. Total cost of the government would be a sum of these costs - IT cost \$3,010, compilation cost \$762.72 and misc postage \$200): total cost to the government of \$3969.12.

### 15. REASON FOR CHANGE IN BURDEN

Adjustments to the previous application were made in two areas. 1) Previous submissions included more hard copy mailing costs and administration of the form (did not provide estimated cost of respondents' time to complete a survey). The majority of the decrease is due to a previous higher estimate of returns (15,000 estimated). Automation changes since the last submittal have made the online form easier to use and requires less time to complete. Total number of responses has also decreased from previous estimates. The new estimates are based on actual surveys submitted plus an estimated increase in response rates with automation or streamlining changes. Thus the decrease from 15,000 in 2011 to the 2,000 responses total provided with this submittal.

### 16. PUBLICATION OF RESULTS

There are no plans to publish the results of the survey.

### 17. NON-DISPLAY OF OMB EXPIRATION DATE

OMB form expiration date will be displayed.

### 18. EXCEPTIONS TO “CERTIFICATION FOR PAPERWORK REDUCTION SUBMISSIONS”

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