

SUPPORTING STATEMENT – PART A

A. JUSTIFICATION

1. Need for the Information Collection

Primary objectives. The primary objective of the *2014 Post-Election Voting Survey of Local Election Officials*, conducted on behalf of the Federal Voting Assistance Program (FVAP), an agency of the Department of Defense, is to identify areas where the electoral process can be improved by providing an accurate picture of the absentee voting process. This investigation will, in turn, permit an ongoing evaluation of the extent to which FVAP is achieving its mission and what actions FVAP might be able to take in the future to improve the process. In addition, the data will assist FVAP in determining if legislative changes have been successful in removing barriers for absentee voting and identify any remaining obstacles to voting by those populations covered by the *Uniformed and Overseas Citizens Absentee Voting Act of 1986 (UOCAVA)*. To obtain the necessary information, the *2014 Post-Election Voting Survey of Local Election Officials* will be administered to the voting jurisdictions in the United States, the U. S. territories, and the District of Columbia with respondents being the Local Election Officials (LEOs).

The study will help determine: 1) whether voting materials are being distributed in a timely manner and whether voting assistance is being made available; 2) the types of obstacles voters encounter when attempting to vote absentee; 3) the impact of FVAP's efforts to simplify and ease the process of voting absentee; and 4) any other problems existing for an absentee voter as determined by the responding election officials. FVAP will use the information to prepare a report to the President and Congress as required by the *National Defense Authorization Act*. Prior to 2010, the voting surveys were administered every four (4) years; i.e., immediately after each presidential election. Beginning in 2010, the surveys are scheduled to be administered every two years, i.e., immediately after each Federal Election.

Legal authorities. The President of the United States designated the Secretary of Defense to administer the *Uniformed and Overseas Citizens Absentee Voting Act (UOCAVA) As Modified by the Military and Overseas Voting Empowerment Act*, 42 USC 1973ff (included as part of this submission). The Act permits members of the Uniformed Services and Merchant Marines and their eligible family members and all citizens residing outside the United States who are absent from the United States and its territories to vote in the general elections for Federal offices. The 1988 Executive Order 12642 (included as part of this submission) names the Secretary of Defense as the “Presidential designee” for administering UOCAVA. In the Department of Defense Directive 1000.04, *Federal Voting Assistance Program (FVAP)* (included as part of this submission), the Secretary of Defense delegated UOCAVA-related responsibilities first to the Undersecretary of Defense for Personnel and Readiness, and then, in turn, to the Director of the Federal Voting Assistance Program. The DoD Directive 1000.04 also updates the policy and responsibilities for FVAP under Executive Order 12642.

2. Use of the Information

Data Collection. The survey will be administered to a sample of the LEOs. These survey questions capture self-reported attitudes and behaviors of the LEOs and ask questions such as: “*During 2014, did your office use any of the following FVAP products or services?*”; “*During 2014, did your office use the FVAP Electronic Transmission Service (ETS) for any of the following reasons?*”; “*During 2014, what was the main reason your office did not use the FVAP staff support?*”; “*FVAP provides various types of assistance to election officials, including online training, reference materials, and site visits. Which type would be most valuable for your office?*” and “*How much do you agree or disagree with each of the following statements about the communication(s) your office receives from FVAP?*”

The data from the survey will identify areas where the electoral process can be improved by providing an accurate picture of the absentee voting process. In addition, because a proportion of the survey questions have been asked after prior Federal Elections, changes over time in some of the areas of interest to FVAP can be assessed.

By whom information will be used. The sponsor of the *2014 Post-Election Voting Survey of Local Election Officials* is the Office of the Under Secretary of Defense (Personnel and Readiness) (OUSD[P&R]), and the users of the data will be FVAP, the Office of the Secretary of Defense (OSD), other DoD senior staff and administrators, and the Defense Manpower Data Center (DMDC).

3. Use of Information Technology

Digitally signed e-mails, electronic files, and web-based technology will be used for respondent communications and for data collection.

To minimize respondent burden and to capitalize on computer-assisted survey administration technology, the respondents will be completing the survey on the web by logging onto the survey operations contractor’s secure website. No hard copy survey data collection is planned. E-mails will be sent to all LEOs for whom a valid e-mail address has been obtained explaining the purpose of the survey and inviting the LEOs to participate (See Section B.2 for more information). To access the website, LEOs will be provided with an individual access code (i.e., a unique Ticket Number listed in both the e-mail and postal communications) which they will need to enter to gain access to the survey application.

Finally, to capitalize on the most current e-mail communication technology, DMDC’s survey operations contractor now has the capability of digitally signing all the e-mails it sends out which enhances the legitimacy and security of all e-mail communications.

4. Non-duplication

There is no other Federal agency tasked with collecting information specific to all the populations covered by UOCAVA and designed to evaluate and report on FVAP’s efforts to simplify and ease the process of voting absentee. The Secretary of Defense, as the “Presidential designee” under 42 USC 1973ff, designated the Director of FVAP to administer and oversee the

Federal responsibilities of the Act. At present, the only available information of a similar nature is information collected by FVAP from surveys of prior elections, with 2012 being the most recent. This information is no longer current, however, and cannot be used to extrapolate to the upcoming election. Without information collected specifically about the 2014 election, FVAP cannot perform its responsibilities under the Act.

The proposed *2014 Post-Election Voting Survey of Local Election Officials* asks questions specifically about the role of FVAP, and these are absent from the EAC survey completely, for example, “*During 2014, did your office use any of the following FVAP products or services?*” The qualitative survey is the only source of information available to FVAP to assist in its efforts to improve these features of the absentee voting process.

The U.S. Election Assistance Commission (EAC), an independent bipartisan commission established by the Help America Vote Act of 2002, will be administering the *2014 Election Administration and Voting Survey* that has been modified for 2014 to add components of FVAP’s *2012 Post-Election Voting Survey of State and Local Election Officials* to avoid duplication of effort. A Memorandum of Understanding (MOU) (included as part of this submission) has been drafted between FVAP and EAC on the subject of reducing the data collection burden by the bi-annual surveys of the EAC and FVAP. The MOU states that EAC and FVAP will work together to produce a single survey to be administered in 2014 following the Federal Election taking place that year.

5. Burden on Small Business

The survey respondents for this data collection are LEOs. No data collection is being conducted with other businesses or establishments.

6. Less Frequent Collection

The *UOCAVA* requires a statistical analysis of absentee voter participation, which includes uniformed services and overseas nonmilitary populations. To obtain the required information under *UOCAVA* to conduct this analysis, survey data need to be collected at the level of the voting jurisdiction, and for 2014 those data will be collected from LEOs. FVAP is then required to prepare a report to Congress. If surveys were not administered, the DoD would not be in compliance with the law and would not be able to report to Congress.

7. Paperwork Reduction Act Guidelines

There are no special circumstances. This collection will be conducted in a manner consistent with guidelines contained in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Received comments. An agency 60-Day Federal Notice was published in Vol. 79, No. 62, Tuesday, April 1, 2014, Federal Register, pages 18286-18287, as required by 5 CFR

1320.8(d). No public comments were received in response to the notice. FVAP corresponds regularly with interested citizens and State and local government officials, e.g., State Board of Elections Directors. Any comments received from these stakeholders regarding survey content were taken into consideration.

A 30-day Federal Notice was published in Vol. 79, No. 107, June 04, 2014, page 32239.

Coordinations were obtained from Ms. Cindy Allard, OSD/JS Privacy Office, WHS/ESD, 571.372.0461 (included as part of this submission) and Ms. Regina Rogers, Exempt Determination and Secondary Review Official, OUSD(P&R) Human Research Protection Program, DHRA, DMDC, 831.583.2400 (included as part of this submission). Approval of the FVAP surveys was provided by Ms. Sharon Cooper, Director, Defense Human Resource Activity (DHRA) (included as part of this submission).

The Defense Manpower Data Center (DMDC), the survey research arm of the Under Secretary of Defense for Personnel and Readiness, will manage the data collection in 2014 for FVAP.

9. Gifts or Payment

No payments or gifts will be provided to LEOs for completing the survey.

10. Confidentiality

The information collection does not ask respondents to submit propriety or trade secret information to DoD. Though DMDC cannot promise confidentiality to this population, respondents will be told that the information they provide will be kept private to the extent permitted by law.

A Privacy Act System of Records Notice (SORN) and a Privacy Impact Assessment are not applicable to this collection since no PII will be collected.

11. Sensitive Questions

The data collection instrument contains no questions of a sensitive nature. The surveys will be non-intrusive and respondents will be informed that their participation is voluntary. The survey does not collect personally identifiable information and survey responses are not retrieved by personal identifier. Therefore, the information collected is not subject to the Privacy Act of 1974, as amended. DMDC will only report results in the aggregate; that is, in the form of statistical summaries.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

Number of Sampled LEOs:	1,500	
Frequency of Response:	1	
Total Annual Responses:	900	Assumes .60 Completion Rate
Burden Per Response:	20	Minutes on Average
Total Burden Minutes:	18,000	Minutes
Total Burden Hours:	300	Hours

b. Labor Cost of Respondent Burden

Total annual respondents:	900	Assumes .60 completion rate
Frequency of response:	1	
Total annual responses:	900	
Burden per response:	20	Minutes on average
Average cost per response:	\$6.81	Burden per response (20 minutes) × hourly rate for GS-8/5 (\$20.43)
Total respondent cost:	\$6,129	Average cost per response (\$20.43) × expected number of responses (900)

c. Explanation of How Labor Cost to Respondent Was Estimated. The annual salaries of the Local Election Officials across all jurisdictions, from the small and more rural jurisdictions to the very large and urban and/or county-wide jurisdictions, undoubtedly varies greatly, but the overall estimated hourly wage used to calculate the average cost per response is the 2014 GS-8/5 hourly rate of \$20.43 (frozen to 2010 levels) excluding any locality adjustment.

13. Respondent Costs Other Than Burden Hour Costs

- a. Total capital and start-up costs annualized over the expected useful life of the item(s). There are no capital/startup costs.
- b. Total operation and maintenance costs. There are no operation and maintenance costs. No outside resources, consultations or record retrieval are required to answer the survey questions. Any computer costs borne by the establishment will be minimal.

14. Cost to the Federal Government

GS Grade/Step	Annual Rate	25% Fringe	Monthly	FTE Months	Cost
12/5	\$85,703	\$107,129	\$8,927	5	\$44,637
13/5	\$101,914	\$127,393	\$10,616	4	\$42,464
14/5	\$120,429	\$150,536	\$12,545	5	\$62,723

15/3	\$133,328	\$166,660	\$13,888	4	\$55,553
Total Cost					\$205,377

Federal labor costs were estimated using the GS Salary Table for 2014-DCB which includes a locality payment of 24.22% for the Washington, Baltimore, and Northern Virginia area. An additional estimated 25% fringe benefit cost was added based on research available from the U.S. Bureau of Labor Statistics.¹

Additional Costs:

DMDC Survey Contractor Operations and Maintenance Cost \$200,000

Includes contractor labor to produce surveys and letters, screening and reminder telephone calls, conducting the non-response bias study, all data collection costs, materials and freight, data storage, and postage.

DMDC On-Site Contractor Support \$180,000

Costs for support contracts are based on negotiated rates for similar services.

FVAP Call Center Costs \$11,000

Government Staffing Cost \$205,377

Includes senior management, project management, instrument development and testing, monitoring data collection, contractor technical oversight, sampling and weighting, analysis of basic data set, data cleaning, creation of tabulations volume, writing statistical methods report, contract administration, consults with FVAP, ad-hoc analysis, preparing and review of the all final internal documents.

Total Cost \$596,377

15. Reasons for Change in Burden

There are no changes in burden.

16. Publication of Results

There are currently no plans to publish the results outside the DoD.

Project schedule.

Activity:

Anticipated Date:

¹ An estimate of 25% as the cost of fringe benefits was taken from a review of two papers available from the U.S. Bureau of Labor Statistics website; 1) *Report on the American Workforce*, U.S. Department of Labor, Elaine L. Chao, Secretary, 2001, and, 2) "The Growth of fringe benefits: implications for social security" by Yung-Ping Chen.

Data collection begins	November 5, 2014
Data collection ends	December 8, 2014
Final Tabulation Volumes produced	February 12, 2015
2014 Post Election Survey Report to Congress	May 1, 2015
Tabulation volumes posted on FVAP website	August 1, 2015

17. Non-Display of OMB Expiration Date

This approval is not being requested.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

No exceptions to the Certification Statement are being requested.