
Signature of Senior Officer or Designee:

Date:

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Wayne Eddins, Departmental Paperwork Reduction Act Officer,
Office of the Chief Information Officer

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

1. Why is this 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/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's 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,

2. How is the information collected and how is the information to be used?

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 is automated (item 13b1 of OMB form 83-i). If it's not automated, explain why not. Also describe any other efforts 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. Is this information collected elsewhere? If so, why any similar information already available cannot be used or modified.

No prior studies have been conducted for this purpose or similar purposes. While surveys of tenant satisfaction have been conducted, they have been for substantively different purposes.

5. Does the collection of information impact small businesses or other small entities (item 5 of OMB form 83-i)? Describe any methods used to minimize burden.

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.

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 nonprofit 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. 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.

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.

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.

An inability to conduct consumer surveys would preclude what HUD management believes is an important piece of information for decision making. Customer information can make HUD a more effective and efficient agency. In addition not collecting this information would be in violation of EO 12862.

7. Explain any special circumstances requiring:

- respondents to report information more than quarterly; **Not Applicable**
- a written response in fewer than 30; **Not Applicable**
- more than an original and two copies of any document; **Not Applicable**
- respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years; **Not Applicable**
- a statistical survey not designed to produce results that can be generalized to the universe of study; **Not Applicable**
- the use of a statistical data classification that has not been reviewed and approved by OMB; **Not Applicable**
- 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; or **Not Applicable**
- respondents to submit proprietary trade secret, or other confidential information. **Not Applicable**

There are no special circumstances. This collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. Identify the date and page number of the *Federal Register* notice (and provide a copy) soliciting comments on the information. Summarize public comments and describe actions taken by the agency in response to these comments. Describe all efforts to consult with persons outside the agency to obtain them. This notice was published in the Federal Register December 21, 2015. No comments were received.
9. Explain any payments or gifts to respondents, other than remuneration of contractors or grantees.
There are no payments or gifts to respondents provided.
10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation or agency policy.
HUD surveys do not assure confidentiality. HUD survey data will not be collected or recorded in a way to permit the identification of individual respondents.

11. Justify any questions of a sensitive nature, such as sexual, religious beliefs, and other matters that are commonly considered private.

The survey instrument for tenants includes selected demographic related to housing for background purposes. These will be analyzed to determine if there are any relationships with measures of tenants' satisfaction and for categorization purposes.

Some of these questions could be considered sensitive by certain respondents. As part of the consent process, respondents will assure that they may choose not to answer any specific question(s).

12. Estimate public burden: number of respondents, frequency of response, annual hour burden. Read the complete instructions on the form 83i. Explain how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices. Provide a table to describe the elements of the burden. Break out each form used.
 - if this collection uses more than one form, provide separate estimates for each form and aggregate the hour burdens in item 13 of OMB Form 83i; and
 - 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 13.

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.

Each month, one week of inquiries processed will be used as the pool for randomly selecting customers to receive survey invitation. The number of survey invitations sent to HUD's FHA Resource Center customers, out of the total pool, will follow these guidelines:

- Resource Center: 4%
- All four HOCs: 30%
- All HQ Offices (no National Oversight): 50%
- FHA online Frequently Asked Question (FAQ) site: 50%

The charts below summarize the sampling frames, survey samples and projected number of respondents for each survey type, based off of one week of June 2015 production. The estimated response rates were derived from testing of the survey instruments.

June 2015 Total Escalated Contacts: $26,195.00/4=6,548.75 \times 12=78,585.00$

June 2015 Resource Center Contacts: $73,440.00/4=18,360.00 \times 12=220,320.00$

June 2015 FAQ Hits (Self Service): $5,557.00/4=1,389.25 \times 12=16,671.00$

June 2015 HQ Escalated Contacts: $646.00/4=161.50 \times 12=1,938.00$

Respondent Group	Respondent Universe (Annual Volume of Resource Center Users)	Survey Sample	Estimated Response Rate Surveys	Projected Number of Completed
Escalated Resolution (30%)	78,585	23,575	0.30	7,072.50
Internal Resolution (4%)	220,320	8,813	0.30	2,643.90
Self Service Resolution (50%)	16,671	8,335	0.30	2,500.50
Escalated Resolution HQ (50%)	1,938	969	0.30	290.70
Total	317,514			12,507.60

The hourly cost per response is based on the per capita income of the United States of \$28,155 (US Bureau of the Census, 2013 American Community Survey) and the corresponding hourly earnings of \$13.54.

Number of Respondents	Total Burden per Respondent (Minutes)	Total Annual Burden Hours	Hourly Cost	Annual Cost
12,507.60	3	37,522.80	\$13.54	\$ 508,058.71

13. Estimate of the annual cost to respondents or record-keepers (do not include the cost of hour burden shown in Items 12 and 14). Read the complete instructions on the form 83i.

There are no additional costs to respondents.

14. Estimate annualized costs to the Federal government.

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 any program changes or adjustments reported in items 13 and 14 of the OMB Form 83i.

The Customer Satisfaction survey with FHA's 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's Resource Center and to assess changes in their satisfaction over time.

This is extension of a currently approved collection.

16. If the information will be published, outline plans for tabulation and publication.

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.

HUD does not publish any results of the survey outside of the agency. The purpose of the survey is to share the results internally with management of the FHA Resource Center and our offices as a mechanism to improve customer service. The data from the results is used to improve standard operating procedures and best practices in providing client responses at the FHA Resource Center and at our agency. In reference to the internal reporting, the monthly survey results / ratings are supplied to the management of FHA’s Resource Center to provide feedback on the customer’s satisfaction survey. The results of the survey information for HQ and the client responses received from the regional offices (HOC’s) is also shared with agency management. This is provided in the form of an overall rating process on a monthly basis. We have included a sample email we send out to one of our managers who is directly responsible for the oversight of the FHA’s Resource Center project. This includes the details on the way the results are provided and the factors applied for these various ratings.

17. Explain any request to not display the expiration date.

The expiration date will be printed on the form.

18. Explain each exception to the certification statement identified in item 19.

There are no exceptions.

B. Collections of Information Employing Statistical Methods

- 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.

Fiscal Year 2015 10-1-2014 to 7-14-2015(To date)

Client Type Report	
Client Type	# of Service Request
Lender Underwriter	118973
Lender Processor	100815
Lender Staff	86324
Homebuyer	62088
Homeowner	52163
Lender Loan Officer	47205
Real Estate Professional	37361
Lender Manager	34342
Other	23433
Renter	22869
Appraiser	17021
Unspecified	10195
Attorney	1961
Closing Agent	1842
Non-Profit	1718

Audit/CPA	886
Trade Association	810
Housing Counselor	635
Gov - Federal	631
Landlord	541
Builder	506
Gov - Local	500
Inspector	325
Rehab Consultant	250
Lender Applicant	238
Gov - State	232
FHA	164
Congressional	18
Grand Total	624046

The chart above represents the total pool eligible of eligible contacts potentially to be offered the survey for FY 15. There were 624,046 Service requests in the fiscal year from the start of FY 15 on 10-1-15 until the day when this Paperwork Reduction Act Submission was completed on 7-14-15.

We plan to utilize the same process of sending surveys which our agency was previously approved under our former OMB approval for the survey instrument. Out of the total pool of service requests, each month we will export service request lists from our CRM application to send out four different surveys depending upon who the where the client received a final response to their inquiry. There are four different potential surveys or ways clients can receive responses. They are 1.) FHA Resource Center Response from call center 2.) Our Four HUD regional offices (Homeownership Centers) Responses. This is where some of the calls will be transferred to from the FHA Resource Center if they are not able to provide an answer to a case specific technical question. 3.) HQ offices - Responses from our headquarters on highly technical questions needing escalations. 4.) Responses from our Self Service Inquiries from our FHA Online Frequently Asked Questions Website.

We then apply the required prior OMB approved percentages to the total eligible pool of contacts who placed inquiries at our FHA Resource Center to address the concerns on the burden of the collection of information. The percentages are as follows:

- FHA Resource Center - 4 percent of total pool of contacts with service requests are sent the survey instrument.
- All four HOC's (Regional offices) – 30 Percent of the total pool of contacts with service requests are sent the survey instrument
- HQ office - 50 percent of the total pool of contacts with service requests are sent the survey instrument.
- FHA online Frequently Asked Questions (FAQ self-service) website - 50 percent of the total pool of contacts with service requests are sent the survey instrument.

The majority of all of our responses are provided by the FHA Resource Center under first call / contact resolution. This is why their percentages for the FHA Resource Contact Center collection are so low (4 Percent). The HOCs and HQ's only receive a minority of these transferred contact inquiries. This is why their percent of contacts potentially being offered the survey instrument is much higher. As you can see from the data above our total survey responses for any given month is very low.

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 above provides an overview of the survey type, pool of potential respondents and mechanism offered:

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.

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.

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