

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

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify legal or administrative requirements that necessitate the collection of information.

In response to Executive Order 12862, "Improving Customer Service through Effective Performance Management", 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 are used to validate customer service standards. This submission is a request by NCA to the Office of Management and Budget (OMB) for the following approval:

- a. Grant NCA a three-year extension of its generic clearance authority;
- b. Allow NCA 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 summary of objectives, specific burden estimates, and 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. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

The National Cemetery Administration will continue to conduct customer satisfaction surveys under this generic clearance for the purpose of implementing the Executive Order. If surveys are not conducted, NCA is unable to comply with the Executive Order and will lack the information needed to improve established standards for the best possible customer focused service. NCA plans to use the information gathered to determine what services are satisfactory and meet customer needs and expectations. Additionally, NCA will gain insight into areas for improvement. Participation in the surveys is voluntary and the generic clearance will not be used to collect information required to obtain or maintain eligibility for a VA program or benefit. 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 National

Cemetery Administration anticipates that 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 ("IC") prior to collecting data. NCA 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 these collections to OMB for review, NCA shall provide a summary report addressing all collections conducted under the generic clearance 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. 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 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. 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.

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

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

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

6. Describe the consequences 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.

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. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

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. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

The agency notice was published in the Federal Register on Monday, September 26, 2016, Vol. 81, No. 186, page 66136. The notice solicited comments relating to the organizations' customer satisfaction survey proposals.

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

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

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

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. 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; include 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.

Questions of a sensitive nature will not be asked.

12. Estimate of the hour burden of the collection of information:

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 the National Customer Satisfaction and State and Tribal Cemeteries surveys by mail with a total annual burden of approximately 15,000 hours each. NCA anticipates 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>
2016	50	150 hours	5 Groups Annually
2017	50	150 hours	5 Groups Annually
2018	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>
2016	50	150 hours	5 Groups Annually
2017	50	150 hours	5 Groups Annually
2018	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>
2016	50	150 hours	5 Groups Annually
2017	50	150 hours	5 Groups Annually
2018	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>
2016	2,500	208 hours	Annually
2017	2,500	208 hours	Annually
2018	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>
2016	15,000	7,500 hours	Annually
2017	15,000	7,500 hours	Annually
2018	15,000	7,500 hours	Annually

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

Frequency of

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Response</u>
2016	4,000	2,000	Annually
2017	4,000	2,000	Annually
2018	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>
2016	5,000	2,500 hours	Annually
2017	5,000	2,500 hours	Annually
2018	5,000	2,500 hours	Annually

National Cemetery Administration Next of Kin State/Tribal Cemeteries 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>
2016	15,000	7,500 hours	Annually
2017	15,000	7,500 hours	Annually
2018	15,000	7,500 hours	Annually

National Cemetery Administration Funeral Directors State/Tribal Cemeteries 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>
2016	4,000	2,000	Annually
2017	4,000	2,000	Annually
2018	4,000	2,000	Annually

IV. ___ Program/Specialized Service Survey

National Cemetery Administration Memorial Products Survey (Next of Kin and Funeral Directors) (Mail, 6, 000 surveys/15 minutes each)

Frequency of

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Response</u>
2016	6,000	1,500 hours	Annually
2017	6,000	1,500 hours	Annually
2018	6,000	1,500 hours	Annually

V. Total Burden Hours Per Year

<u>Year</u>	<u>Total Number of Respondents (all surveys)</u>	<u>Estimated Annual Burden</u>
2016	51,650	23,658
2017	51,650	23,658
2018	51,650	23,658

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

There is no cost to the respondent to complete the survey.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation 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 also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated costs for these surveys including contract support, travel costs, and other direct costs is \$1,204,250.00. This figure also includes all costs for the surveys, focus groups, and structured interviews.

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

The Program/Specialized Service National Cemetery Administration Memorial Products Survey (Next of Kin and Funeral Directors) Mail survey minutes increased from 10 to 15 minutes. Thus, the Estimated Annual Burden hour increased from 1000 to 1500 hours, increasing the overall yearly burden to 23,658.

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.

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

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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