

**Supporting Statement for
VBA Loan Guaranty Service Lender Satisfaction Survey
OMB 2900-0711**

A. Justification

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

The mission of the VA Loan Guaranty Service (LGY) is to help Veterans and active duty personnel attain, retain and adapt homes in recognition of their service to our nation. The program offers many advantages to veterans, including no down payment and no mortgage insurance premiums. Since the program's inception in 1944, it has helped nearly 23 million veterans become homeowners. The program is administered by the Veterans Benefit Administration (VBA).

As part of the agency's continuing commitment to improve the services provided to veterans, LGY will conduct the VBA Loan Guaranty Service Lender Satisfaction Survey. The proposed effort will build upon previous VBA customer satisfaction surveys and will measure lender satisfaction with the various aspects of the VA LGY program.

Note that the original clearance (Approval No. 2900-0711) included two additional customer satisfaction survey instruments (Specially Adapted Housing and Veteran Home Loan Guaranty). Those surveys are now incorporated in the VBA Voice of the Veteran clearance, and are no longer being administered under this information collection (2900-0711). The LGY Lender Customer Satisfaction survey is in this information collection request for FY 2018 and subsequent years (up to the expiration date of the survey clearance).

Survey of Lender Satisfaction with the VA Home Loan Guaranty Process (i.e. Lender Survey): Gathers satisfaction data from lending institutions that participated in VBA LGY program during the past fiscal year. [Note that the survey title will include the FY in which the loans were guaranteed; i.e. the FY 2018 Lender Survey will survey lenders who made 12 or more loans in FY 2017].

The results from this survey are a vital source of performance data for the LGY Program that is not available from other data sources.

This survey will be conducted per the legislative requirement set forth in Executive Order 12862. The Order mandates that government agencies set standards and seek to measure agency performance against such standards. This survey is also being conducted in concurrence with the Government Performance Results Act (GPRA) and its requirements for improving customer service.

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.

Specifically, VBA requires annual customer satisfaction information from lenders in order to gauge the ease by which the LGY Program can be utilized by the lending community as

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well as assess the level of lender satisfaction with the overall program. The survey data collected from lenders will be used by the LGY Program to make improvements to the Loan Guaranty process, which in turn, will enable lenders to serve veterans in the most efficient and effective way possible.

The information will be collected during FY 2018 and will be used by the Loan Guaranty office to determine lender satisfaction with the LGY Program. A major use of the data will be to formulate program and policy changes to ensure that beneficiaries are effectively served. In addition to using survey results to make program improvements, past analysis of LGY customer satisfaction data have allowed the VA to measure progress towards the agency's strategic performance targets, as outlined in the VA Strategic Plan and President's Budget Submission. Currently, there are no other means of evaluating lender satisfaction with the VBA LGY Program.

The lender survey informs the following LGY Performance Measures (as specified in the President's budget) listed below.

- Lender Survey: Percent of lender respondents who report they are satisfied with the overall VA Loan Guaranty Program: *“Overall, how satisfied are you with the VA loan guaranty program?”*

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.

Internet based. The Lender survey will be administered online as a web-based data collection. This will maximize the timeliness, efficiency, and response rate of data collection from lenders. VA LGY staff has strong capabilities in hosting surveys on the internet, and maintains effective security and privacy procedures (e.g., unique passwords for respondents, data encryption) when designing and programming web surveys. The web address (URL) on which the survey will be hosted and accessed by respondents will be included in the materials sent to lenders advertising the survey. Lenders will then connect to the appropriate web page and complete the survey.

The reduction of respondent burden for the survey through reliance on technology supports the goals and requirements of the Government Paperwork Elimination Act (GPEA).

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.

As noted, the VBA conducted customer satisfaction surveys of the LGY Program in FY09. While these data sources provide a comprehensive snapshot of Lender satisfaction with

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the program for the periods indicated, the data are not current enough to provide the information required to meet the VBA's need to provide annual performance data as required by the requirements of P.L. 103-62, the Government Performance and Results Act of 1993 and Title 38 USC, §527, Evaluation and Data Collection.

Our review of available data suggests that no sources outside of VBA's LGY survey program are available that provide reliable data on a representative sample of VA lenders.

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

This information collection does not have a significant impact on a substantial number of small businesses. Mortgage lenders have access to the technology required to respond to the survey (internet access and a computer). The time taken to complete a survey (estimated at 15 minutes) would not unduly burden the staff of a small lender.

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.

If the FY 2018 LGY Lender Customer Satisfaction Survey is not conducted, VBA will not be able to fulfill its performance measurement requirements as articulated by the requirements of P.L. 103-62, the Government Performance and Results Act of 1993 and Title 38 USC, §527, Evaluation and Data Collection. Furthermore, VBA would miss an opportunity to learn from lending partners about how to improve the home loan process to best serve the needs of America's veterans. VBA would also forego the ability to establish baseline data for purposes of tracking and documenting trends, improvements, and declines in lender satisfaction.

The design and administration of the suite of LGY Customer Satisfaction Surveys incorporates significant measures to minimize burden on respondents. (These specific measures are discussed in more detail in section 12). There are currently no technical or legal obstacles to reduce burden using the planned methods.

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 to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

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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 Department notice was published in the Federal Register on August 15, 2017, Volume 82, No. 156, pages 38760-38761. No comments were received in response to this notice.

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

Decisions to provide any payment or gift to respondents does not apply.

10. Describe any assurance of privacy to the extent permitted by law provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Respondents are assured that answers given will be kept private to the extent of the law and will be used for research purposes only. The information that respondents supply is protected by law (the Privacy Act of 1974, 5 U.S.C. 522a and section 5701 of Title 38 of the United States Code). Privacy Act Issuances, 2001 Compilation.

11. Provide additional justification for any questions of a sensitive nature (Information that, with a reasonable degree of medical certainty, is likely to have a serious adverse effect on an individual's mental or physical health if revealed to him or her), 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.

No questions of a sensitive nature are contained on the form.

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

- a. Number of yearly respondents totals = 24,000.
- b. Number of Lenders surveyed (N) is estimated at 1,100/year.
- c. Number of respondents is estimated at 275 per year. (Estimated 25-percent response rate x N (1,100))
- d. Frequency of response is one-time.
- e. Annual burden is estimated at 69 hours (275 respondents x .25 hours = 68.75 hours).
- f. The total estimated cost to respondents is \$2,530 (69 hours x \$36.67 per hour).

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The Bureau of Labor Statistics (BLS) gathers information on full-time wage and salary workers. According to the latest available BLS data, the median weekly earnings of full-time wage and salary workers are \$1,224.00. Assuming a forty (40) hour work week, the mean hourly wage is \$36.67 based on the BLS wage code – “13-2072 Loan Officers.” This information was taken from the following website: <https://www.bls.gov/oes/current/oes132072.htm>.

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

This submission does not involve any recordkeeping costs.

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.

VA anticipates a de minimis cost associated with in-house printing of survey mailing materials (notification letter and postcard reminders to lenders). Costs would cover paper and cardstock for the printed materials. VA estimates those costs to be ~\$5,000.

15. Explain the reason for any burden hour changes since the last submission.

Since the last OMB Clearance review, the number of estimated burden hours has declined from 251.5 to 69. This is largely due to the estimated reduction in response rate (from 35% previously, to 25% anticipated for this collection). VBA also notes that partial-hours are rounded to the next highest hour.

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.

Section A, is the proposed project plan for the tabulation and publication of survey data, including the analytical techniques and database management strategies to be employed. Following this, Section B provides an overview of the project timeline.

Section A: TABULATION AND PUBLICATION

- **Collect Surveys and Monitor Response Rates**

During the survey field-period, the survey database will be analyzed as responses are received to ensure the currency of the name and address data file. While the database being used to administer the survey and compile the data includes a safeguard, which is designed to prevent

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multiple submissions from a single user, VA's staff will perform an additional audit to inspect and remove duplicate surveys that may have not been filtered automatically.

VA will host a password-protected website that will provide response rates from the web-based survey for the LGY Lender Customer Satisfaction Survey. Throughout the 12-week period that the survey will be fielded, data will be updated at a minimum on a weekly basis. VBA will review the response rates on a biweekly basis and generate ideas to increase the response rates.

- **Develop Prototype Reports**

Prototype reports will be developed with the end-user in mind. Reports will provide a clear explanation of findings, and will consist of the following sections:

- Executive summary
- Project methodology
- Survey results
- Appendices (e.g., copies of questionnaires and mailing materials).

VBA's staff will pretest automation routines for new designs in the prototype reports to ensure that report exhibits, graphics, and data tables can be reliably and accurately established for each report type. Development of the automated report system will consist of several concurrent tasks.

- **Submit "Live" Draft Reports**

The production of the draft report requires "quick" turnaround of data cleaning and automated report production. This section details the steps to be taken to produce draft reports for each of the LGY surveys using actual data from the survey administration. There are two significant subtasks involved in producing the draft report:

- Subtask 1: Clean and analyze survey data
- Subtask 2: Develop draft report.

Each of these subtasks is described below.

Subtask 1—Clean and analyze survey data. Shortly after the survey analysis process commences, LGY staff will examine the respondent data file to ensure that the data collection program is reading the surveys properly and that all of the variables are correctly placed and formatted. The sample data file will also be used to test the data cleaning programs. This process will identify any errors in the survey data collection process.

Once the final surveys have been collected and a raw ASCII data file has been produced, the process of creating SPSS data files will begin. An SPSS syntax program will be run to convert

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the ASCII data into separate SPSS data files representing each RLC and the national file. Each RLC's "raw" SPSS data file will be saved into its own sub-directory, and a copy of the original ASCII data file will be archived separately as a quality control measure. LGY staff will analyze the SPSS data files, including conducting frequencies, cross-tabulations, and quadrant analyses. The analyses will be geared toward providing LGY and other VBA staff with operationally useful.

Subtask 2—Develop draft reports. A total of 2 draft reports will be produced based on data from the national file for the Lender survey. Using the automated report generation tool, the data will be analyzed and key findings will be identified and summarized in the executive summary. Production of a draft report provides LGY staff an opportunity to assess the accuracy, quality, and utility of the report structure and content prior to production of all reports.

- **Submit Strategic Performance Data**

In accordance with the Government Performance and Results Act (GPRA), LGY has identified key elements from the customer satisfaction surveys that will provide strategic performance data for the VBA. Specific performance data that will be used will include but will not be limited to:

- Lender Survey: Percent of lender respondents who report they are satisfied with the overall VA Loan Guaranty Program: *“Overall, how satisfied are you with the VA loan guaranty program?”*

- **Conduct Briefing for LGY Management**

LGY staff tasked with the survey will develop data tabulations on survey highlights from the customer satisfaction survey and present the results informally to LGY staff. LGY staff will work closely with internal VBA staff to determine the most salient findings to present in the briefing.

- **Conduct Formal Briefing**

LGY staff will incorporate feedback, suggestions, and edits from internal LGY staff on the informal briefing to develop the final version of the briefing. Following this, LGY staff will provide one face-to-face, formal, professionally conducted briefing on the results of the surveys to senior LGY and VBA management. LGY staff will supply 20 bound, color copies of the final reports, and 15-20 color copies of the briefing presentation.

- **Submit Final Reports**

The LGY staff will submit all reports in final form, incorporating suggestions from internal LGY staff where agreed. LGY staff will deliver bound color copies of the final survey reports, and

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CDs containing electronic copy of the reports, to each of the nine RLCs. LGY staff will send each RLC one package containing one copy of the National report from the survey. The report will also be posted to the VBA intranet.

Section B: PROJECT TIMELINE

The major activities for the VBA LGY customer satisfaction survey project are structured by task, and are outlined below.

- Task 1: Print sample notification letters, envelopes, and reminder cards
- Task 2: Revise the Lender survey
- Task 3: Conduct cognitive labs and summarize results
- Task 4: Draw stratified random samples (where necessary)
- Task 5: Revise and finalize the survey mailing materials
- Task 6: Revise and finalize the survey questionnaires
- Task 7: Manage telephone assistance line
- Task 8: Host live Web surveys
- Task 9: Conduct surveys
- Task 10: Collect surveys and monitor response rates
- Task 11: Develop prototype reports
- Task 12: Revise prototype reports
- Task 13: Submit “live” draft reports
- Task 14: Submit strategic performance data
- Task 15: Conduct informal briefing on survey results
- Task 16: Conduct formal briefing
- Task 17: Submit final reports

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

VA does not seek approval to omit the expiration date for OMB Approval from the collection instrument.

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

This submission does not contain any exceptions to the certification statement.

B. Collection of Information Employing Statistical Methods

1. Provide a numerical estimate of the potential respondent universe and describe any sampling or other respondent selection method to be used. Data on the number of entities (e.g., households or persons) in the universe and the corresponding sample are to be provided in tabular format for the universe as a whole and for each stratum. Indicate expected response rates. If this has been conducted previously include actual response rates achieved.

As noted in part A, this information collection comprises a suite of customer satisfaction surveys of the Veterans Benefits Administration (VBA) Loan Guaranty (LGY) Service. The respective target populations for these surveys are as follows:

- **Survey of Lender Satisfaction with the VA Home Loan Guaranty Process (i.e. Lender Survey):** gathers satisfaction data from lending institutions that participated in VBA LGY program during the past fiscal year. [Note that the survey title will include the FY in which the loans were guaranteed; i.e. The FY 2018 Lender Survey will survey lenders who made 12 or more loans in FY 2017].

This section describes the universe of respondents for each survey, and the sampling plan that will be employed to achieve a representative sample for each survey.

Lender Survey

For the Lender survey, useful customer satisfaction data can only be obtained from lenders who are entirely familiar with the VA Home Loan Program. Using the population of **all** participating LGY lenders would likely yield a large number of inexperienced lenders, and would therefore not serve the purpose of the survey. To ensure useful data, the survey population will be limited to those lenders who have processed 12 VA loans or more in the prior 12 months. All such lenders can be assumed to have the familiarity with the VA Home Loan Program required to provide useful data. Using this threshold also facilitate comparison of findings with previous iterations of the Lender survey, since this criterion for selection was used previously.

The first stage is therefore to identify those lenders who meet the 12-loan criteria from the population of all participating lenders. Based on administrative data from VA, the size of this universe is approximately 1,100. Project resources allow the VA to survey the full census of lenders meeting the 12-loan threshold. Surveying the census of those conducting 12 or more loans, rather than drawing a sample, eliminates concerns regarding sampling error with respect to this particular survey, making this an attractive methodological choice.

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The table below displays the universe of qualifying lenders, the expected response rate, and the expected yield of completed Lender surveys. We anticipate a response rate of 35% for FY18, similar to the response rate achieved in the FY09 Lender Survey.

LENDER SURVEY UNIVERSE, EXPECTED RESPONSE RATE AND SURVEY YIELD		
No. of Lenders making 12+ VA Loans in FY17	Expected Response Rate	Completed Surveys Expected
1,100	25%	275

2. Describe the procedures for the collection of information, including: Statistical methodology for stratification and sample selection; the estimation procedure; the degree of accuracy needed for the purpose in the proposed justification; any unusual problems requiring specialized sampling procedures; and any use of periodic (less frequent than annual) data collection cycles to reduce burden.

The Lender survey will be sent to the universe of eligible respondents because these populations are small, and 95% confidence intervals are desired for the statistical estimates of customer satisfaction that are produced.

3. Describe methods used to maximize the response rate 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.

LGY will develop, administer, and analyze this set of survey. The development of the survey will reflect the comments, suggestions, and results from previous iterations of each survey

Strategies to Maximize Response Rates

LGY will employ methods to minimize respondent burden and to maximize survey response rates. This section identified the strategies to be employed to reach these objectives. Each strategy is outlined below.

- Strategy # 1 to Maximize Response Rates: Using Web Technologies for Ease of Response

The Lender survey will be web-based and will be administered online. The web address where the survey is posted will also be included in the mailings indicated below. Lenders will then connect to the appropriate web page and complete the survey. It is reasonably expected that all lending agencies will have computers and Internet connections, the Lender survey will be administered online to maximize the timeliness, efficiency, and response rate of data collection.

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The web-based Lender survey will be developed with the end user in mind, with the goal of providing a user-friendly website in which to complete the survey.

The online survey technology will incorporate several features to maximize response rates and respondent usability. These include a password system, which prevents any one person from completing more than one survey. Other features include user-friendly drop-down boxes, internal links to the directions throughout the survey, and internal links to key terms and definitions.

- Strategy # 2 to Maximize Response Rates: Conduct Cognitive Labs/Pre-testing of Surveys

LGY staff will conduct cognitive labs with three or more test users for the survey to determine whether respondents understand the survey questions and answer choices, as intended. LGY staff will draw a small pool of names from potential participants in the survey for inclusion in the cognitive labs. Cognitive lab participants will be drawn from the same population that will be used for the main study. The contractor will submit the list of potential participants to the VBA for review and approval. Once identified, LGY staff will contact potential participants by telephone and ask them to participate. Cognitive lab sessions will take place in the metropolitan Washington, DC area.

Once the participants have been selected, LGY staff will conduct cognitive lab sessions aimed at identifying needed additions or refinements to the questionnaire. Cognitive labs are one-on-one sessions with potential survey participants, in which respondents are asked to complete the questionnaire while thinking aloud. The primary purpose of these sessions is to gather feedback on survey questions and answer choices to ensure they are easily understood and correctly interpreted. Outcomes of cognitive labs include, but are not limited to: addition or omission of specific questions, changes to wording of questions, clarification of question response options, addition of response options, and changes to ordering of questions.

LGY staff will prepare a summary report of the cognitive testing session for the web version of the Lender customer satisfaction survey. The results of the cognitive labs will be taken into account when revising and finalizing the survey questionnaires.

- Strategy # 3 to Maximize Response Rates: Maintaining a Survey Hotline

During the period that the surveys are in the field, LGY staff will provide and maintain a telephone line to answer any questions respondents and Regional Office points of contact may have about the survey (e.g., how to interpret questions and response items, the purpose of the survey, how to get another survey if their copy has been lost/damaged). Project staff will be available to answer telephone calls during regular business hours (8:30 a.m.-6 p.m. ET). A voice messaging system will be available to receive messages after regular business hours so after-hours calls can be responded to within 24 business hours.

- Strategy # 4 to Maximize Response Rates: Excluding Questions of a “Sensitive” Nature

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The fact that none of the questions included in the surveys are sensitive, or private in nature, will encourage participation.

- Strategy # 5 to Maximize Response Rates: Assuring and Maintaining Confidentiality

Respondents for the survey will be assured that their personal anonymity will be maintained. For the Lender survey, each response will be identified by its corresponding ‘Lender ID number’; thus, each response will be attributed to a specific lending *agency*, not an *individual*.

Respondents will be informed of this fact in the initial pre-notification letter and subsequent survey notification letters.

- Strategy # 6 to Maximize Response Rates: Secure Networks and Systems

LGY will have a secure network infrastructure that will protect the integrity of the databases, the survey application, and all associated server resources. The servers are protected by a strong firewall system and the operations center is in a secure temperature-controlled location, where network services are continually monitored by automated real-time programs to ensure the integrity and availability of all critical components. All key servers will be supported by a backup power supply that can continue to run the systems in the event of a power outage.

Approach to Examine Non-Response Bias

Non-response bias refers to the error expected in estimating a population characteristic based on a sample of survey data that under-represents certain types of respondents. Stated more technically, non-response bias is the difference between a survey estimate and the actual population value. Non-response bias associated with an estimate consists of two components – the amount of non-response and the difference in the estimate between the respondents and non-respondents. While high response rates are always desirable in surveys, they do not guarantee low response bias in cases where the respondents and non-respondents are very different. Two types of non-response can affect the interpretation and generalizability of survey data: item non-response and unit non-response. Item non-response occurs when one or more survey items are left blank in an otherwise completed, returned questionnaire. Unit non-response is non-participation by an individual that was intended to be included in the survey sample. Unit non-response – the failure to return a questionnaire – is what is generally recognized as survey non-response bias.

There are two approaches to tackling the effects of non-response. One is to minimize the chances of non-response at the data collection stage. This may involve introducing measures which aim to maximize the response rate. The other approach is to make statistical adjustments at a survey follow-up stage when all the data is collected. Both approaches are described in the next paragraphs of this section.

Since it is not always possible to measure the actual bias due to unit non-response, there are strategies for reducing non-response bias by maximizing response rates across all types of

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respondents. In the face of a long-standing trend of declining response rates in survey research (Steeh, 1981; Smith, 1995; Bradburn, 1992; De Leeuw & Heer, 2002; Curtin & Presser, 2005), these strategies include:

- Use of notification letters, reminder letters and postcards.
- Use of novelty in correspondence such as reminder postcards designed in eye-catching colors.
- Use of well-designed questionnaires and the promise of confidentiality.
- Providing a contact name and telephone number for inquiries.

Employing these strategies to the administration of the VA LGY Lender Customer Satisfaction Survey will be crucial for maximizing high response rates across all respondent types (see section on maximizing response rates above).

Non-response follow-up analyses can help identify potential sources of bias and can help reassure data users, as well as the agency collecting and releasing the data, of the quality of the data collected. The approach to examining the presence of non-response bias will be conducted in two steps:

- **Step 1: For the survey, compare the demographics of respondents from the previous VA LGY Surveys to the demographics of non-respondents from the previous VA LGY Surveys.** To further examine the presence of non-response bias, we will compare the demographics of responders (i.e., those who responded to the VA LGY Surveys) to the non-responders (i.e., those who did not respond to the VA LGY Surveys).
- **Step 2: The comparison between the two groups mentioned above, will be made on the following variables for the survey of lenders:**
 - Size of Lender – it is possible that respondents and non-respondents may differ with respect to the size of the lender.
 - Length of Time in Industry – it is possible that respondents and non-respondents may differ with respect to the length of time in the industry.

Based on the two steps discussed above, we will identify issues with respect to non-response bias.

- 4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions of 10 or more individuals.**

LGY staff will conduct cognitive labs with at least three, but not more than 10 test users for the survey to determine whether respondents understand the survey questions and answer choices, as intended. LGY staff will draw a small pool of names from potential participants in each of the

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surveys for inclusion in the cognitive labs. Cognitive lab participants will be drawn from the same population that will be used for the main study. Once identified, LGY staff will contact potential participants by telephone and ask them to participate. Cognitive lab sessions will take place in the metropolitan Washington, DC area.

Once the participants have been selected, we will conduct cognitive lab sessions aimed at identifying needed additions or refinements to the questionnaire. Cognitive labs are one-on-one sessions with potential survey participants, in which respondents are asked to complete the questionnaire while thinking aloud. The primary purpose of these sessions is to gather feedback on survey questions and answer choices to ensure they are easily understood and correctly interpreted. Outcomes of cognitive labs include, but are not limited to: addition or omission of specific questions, changes to wording of questions, clarification of question response options, addition of response options, and changes to ordering of questions.

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.

Our LGY contact person is Carleton Sea, 202-632-8827.