

# **Supporting Statement A**

## **“Customer Satisfaction Surveys”**

### **OMB Control Number 1090-0007**

**Terms of Clearance:** None.

#### **General Instructions**

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question “Does this ICR contain surveys, censuses, or employ statistical methods?” is checked “Yes,” then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

#### **Specific Instructions**

##### **Justification**

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

We are requesting a three-year extension of the generic clearance to conduct customer satisfaction measures of Federal Government programs and services utilizing the methodology of the American Customer Satisfaction Index (ACSI) [see supplementary documents ACSI Methodology Paper and CFI ACSI Methodology]. An extension will allow for continued use of a data-driven, statistically valid approach to understanding customer satisfaction with agency interactions and processes. By using the ACSI methodology, agencies gain important insights about who their customers are and what specifically drives their satisfaction. This allows decision-makers to objectively measure their processes and/or service delivery and use the results to allocate resources more effectively. The ultimate objective is to help agencies become more citizen-centric and achieve higher levels of citizen trust and confidence.

The primary law that supports these efforts is the Government Performance and Results Act of 1993, 31 U.S.C. 1116, which has as one of its purposes “improve Federal programs effectiveness and public accountability by promoting a new focus on results, service quality, and customer satisfaction.” Such an initiative is also widely supported by longstanding administrative policy, as expressed in Executive Orders and Laws, described below.

Official policy on customer service standards is contained in Executive Order 12862, Setting Customer Service Standards, which establishes that Federal Government agencies should survey customers to determine their level of satisfaction with existing services, measure customer service satisfaction results against service standards, benchmark customer service performance

against the best in business, provide customers with choices in both the sources of service and the means of delivery, make complaint systems easily accessible, and provide means to address customer complaints. Agencies are to utilize information about their customer satisfaction results in judging the performance of agency management and in making resource allocations.

In 2007, President Bush issued Executive Order 13450 aimed at improving Government Program Performance. The Order focused on maximizing the effectiveness of programs for citizens through establishing clear annual and long-term goals and having the means to measure progress toward these goals. A Performance Improvement Council was established within the Office of Management and Budget to provide oversight to agencies in implementing the Order.

In January 2009, the Obama Administration released a memorandum to all Executive Departments and Agencies calling for the creation of a more transparent, participatory, and collaborative Government. The memorandum notes that Executive departments and agencies should solicit public feedback to identify information of greatest use to the public, determine how to best increase and improve opportunities for public participation in Government, and assess and improve the level of collaboration and cooperation between Government and nonprofit organizations, businesses, and individuals in the private sector. The Chief Technology Officer, General Services Administration, and OMB were charged with coordinating efforts to produce an Open Government Directive that would address specific actions for implementing the principles of a transparent and open Government. Use of ACSI surveys to provide reliable and statistically sound information directly supports improved performance, enhanced citizen involvement, openness and accountability.

The GPRA Modernization Act of 2010 enhanced the federal government's performance management by creating two new frameworks: 1) one government-wide performance plan developed by OMB with input from departments and agencies, and 2) agency priority goals that are identified and reported quarterly. GPRA 2010 tasks the agency Chief Operating Officer and Performance Improvement Officer with the overall organization management to improve performance.

On April 27, 2010, President Obama issued Executive Order 13571 - Streamlining Customer Service Delivery and Improving Customer Service. This E.O. requires each agency to develop a customer service plan in consultation with OMB that addresses how each agency will provide services in a manner that streamlines service delivery and improves the experience of its customers. The E.O. requires the establishment of mechanisms to solicit customer feedback on Government services and using feedback regularly to make improvements. Furthermore, the E.O. requires improving the customer experience by adopting proven customer service best practices across service channels as well as identifying ways to use innovative technologies to accomplish customer service activities, thereby lowering costs, decreasing service delivery times and improving the customer experience (as can be accomplished through agency websites).

The Obama Administration clearly recognizes that while federal resources need to be allocated to programs and managers that deliver results, agencies need to engage and collaborate with the public to ensure that programs are structured in a way that maximizes effectiveness and strives to

improve program quality. Therefore, agencies are likely to make more use of information collections involving citizen input and perspectives—like ACSI surveys—in order to collaborate effectively with the public and meet Administration mandates. In addition to its role as the international “gold” standard for assessing and benchmarking customer satisfaction, an ACSI survey is also the perfect tool for agencies to use in demonstrating their willingness to be open and collaborative, as they solicit input and feedback on the widest possible array of government activities and information.

The advantages of ACSI surveys are many and include most notably achieving statistical significance with minimum cost and burden on agencies and the public. In recent years, agencies in every department of the Federal Government have gained valuable insights from citizens using the ACSI and implemented a wide array of service improvements that have kept overall satisfaction with the Federal Government moving up.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.

During the past two years, the ACSI measurements have been critical for agencies’ leaders and managers to:

- Better identify who is using their programs or services.
- Determine what drives customer satisfaction.
- Understand the relationship between customers’ satisfaction with their experiences and future behaviors.
- Prioritize resource allocation based on their ability to drive Return on Investment.
- Measure customer satisfaction on a regular, systematic basis.
- Identify areas for improvement.
- Quantify the impact of improving citizen satisfaction on future behaviors to create desired outcomes.
- Drill down to evaluate satisfaction of different user groups and various sections of agency programs or services.
- Benchmark performance against the private sector and other Federal agency programs or services with a similar mission.

Regarding benchmarking, Federal leaders and managers have long been frustrated because of the uniqueness of government services and program, and have struggled to understand how well services are being delivered to the American public. The ACSI methodology helps alleviate that frustration because it enables benchmarking, where it is appropriate. The ACSI methodology enables Federal leaders and managers to have a consistent basis for benchmarking their performance. Because the approach uses the same questions about Satisfaction, Expectations and Comparisons to the Ideal to create the index, agencies can compare their indexed results to the benchmark and understand how they stack up in the eyes of their customers compared to other federal agencies. Where it is relevant, these benchmarking comparisons can also be made

with the private sector. For example, the Veterans Health Administration (VHA) compares its ACSI results to that of the Hospital Industry index in the private sector.

This benchmarking capability helps Federal leaders and managers understand how their programs/processes compare on a standardized measurement to other Federal programs/processes and/or to private sector industries or companies who have similar missions. To accomplish the benchmarking for the U.S. economy, each private sector company in the ACSI is weighted within its industry by its most recent year's revenue for the products and/or services measured in the US household consumer market. Customer satisfaction is measured for an aggregate of other non-measured companies in each industry and revenues obtained for the total of non-measured companies for weighting each industry by the measured companies plus all other companies. Until 2008, the overall benchmark for the US Government was calculated by weighting agency scores by the budget allocated to the measured customer segment. To achieve a more comprehensive benchmark and include agencies not conducting ACSI surveys among their customers, a panel approach is now used to determine overall satisfaction with Federal agencies.

For more than 10 years, Federal agencies have used the ACSI measurement of customer satisfaction as a key indicator in their Program Management outcomes. In cases where Program Managers were not measuring customer satisfaction, OMB has advised or recommended that customer satisfaction measurement is necessary in managing agency programs. The ACSI methodology provides a sound framework for measuring customer satisfaction. ACSI scores were used by some Program Managers in their Performance Assessment Rating Tools (PART) submissions under the Bush Administration and continue to be used in reporting customer satisfaction goals in the Obama Administration. Some agencies have also included the ACSI scores and/or improvement of their ACSI scores in their performance measurement systems as key indicators of progress. In some cases, agencies have also used their scores and/or improvement of their scores in their performance management systems.

In addition, the surveys approved under the generic clearance has enabled the Federal Consulting Group (FCG) to provide the general public and policymakers in the Executive and Legislative Branches with data reporting on trends in overall customer satisfaction with Federal Government programs and services, as well as other insights related to citizen behaviors and usage. We also created a community of practice, the Interagency Customer Satisfaction Forum, in which members of all departments could come together on an annual basis to learn from each other, hear speakers from the highest levels of the Administration, and recognize agencies that are doing particularly outstanding work in providing and citizen services.

Since the generic clearance was issued, a growing number of agencies and program managers have adopted the ACSI as a research and feedback tool and customer satisfaction metric. Agencies have been able to utilize the data and ACSI model results to guide their improvement efforts with a greater focus on customer identity, inputs and preferences. Many agencies have reported on and have been recognized for their successes at the Interagency Customer Satisfaction Forum.

The ACSI methodology has been thoroughly vetted in the academic literature and empirically tested in literally thousands of studies across government and the private sector. Exhibit 1 below provides a summary of the key questions in the ACSI Questionnaire and the supporting rationale for each.

**Exhibit 1**  
**Key Questions: ACSI Sample Questionnaire)**

<b>Question</b>	<b>Supporting Rationale</b> (See Pages 7 – 17 in the attached ACSI methodology paper)
Q1. Before you used the [AGENCY /PROGRAM], you probably knew something about the [AGENCY/PROGRAM]. Now think back and remember your expectations of the overall quality of the [AGENCY/ PROGRAM]. Please give me a rating on a 10-point scale on which “1” means your expectations were “not very high” and “10” means your expectations were “very high”. How would you rate your expectations of the overall quality of [AGENCY/ PROGRAM]?	This question focuses on what a respondent’s expectations are at the outset of the use of or experience with the Agency or Program and is one of the three antecedents of customer satisfaction. (See paragraph 2 on page 12.)
Q2. – Q9. [QUESTION RATING AN ASPECT OF ACTIVITY]	These are the constructs (drivers) of quality and, by extension, satisfaction as well.  <i>Examples</i> of aspects of an activity or experience are: <ul style="list-style-type: none"> <li>• Accessibility of Information Provided by the Agency,</li> <li>• Clarity of Information Provided by the Agency</li> <li>• Ease of Filing (an application, a tax form)</li> <li>• Professionalism (of the customer service people with whom the respondent may have dealt)</li> <li>• Responsiveness (of the customer service people or the process to obtain service/information/answers)</li> </ul>
Q10. Please consider all your experiences in the past two years with the [AGENCY/ SERVICES/PRODUCTS]. Using a 10-point scale, on which “1” means “not very high” and “10” means “very high,” how would you rate the overall quality of the [AGENCY/SERVICES/PRODUCTS]?	This question focuses on what a respondent’s perceived quality of the use of or experience with the Agency or Program and is one of the three antecedents of customer satisfaction. (See paragraph 2 on page 12.)
Q11. First, please consider all your experiences to date with the [AGENCY/SERVICES/ PRODUCTS]. Using a 10-point scale on which “1” means “very dissatisfied” and “10” means “very satisfied”, how satisfied are you with the [AGENCY/SERVICES/ PRODUCTS]?	This question – satisfaction - is one of the key manifest variables and is used to measure satisfaction as a latent variable. (See paragraph 1 on page 16.)

Question	Supporting Rationale (See Pages 7 – 17 in the attached methodology paper)
<p>Q12. Considering all your expectations, to what extent has the {AGENCY/SERVICES/ PRODUCTS} fallen short of your expectations or exceeded your expectations? Using a 10-point scale on which “1” now means “falls short of your expectations” and “10” means “exceeds your expectations,” to what extent has the [AGENCY] fallen short of or exceeded your expectations?</p>	<p>This question confirms/disconfirms customer expectations as a result of their experiences. (See paragraphs 2 and 3 on page 12.)</p>
<p>Q13. Forget the [AGENCY] for a moment. Now, I want you to imagine an ideal [AGENCY/SERVICE/PRODUCT]. (PAUSE) How well do you think the [AGENCY] compares with that ideal [AGENCY/SERVICE/PRODUCT]? Please use a 10-point scale on which “1” means “not very close to the ideal” and “10” means “very close to the ideal.”</p>	<p>This question focuses on the performance of the agency/service/product observed by the customer versus his/her ideal agency/service/product in the category. (See paragraph 1 on page 16.) This question is integral to the approach used in the ACSI methodology and has been thoroughly tested and peer reviewed in terms of both the question wording and the scale anchors employed.</p>
<p>Q14. Have you complained to the [AGENCY] in the past year?</p>	<p>Customer complaints are measured to confirm the expected consequence of increasing satisfaction, which is a decrease in complaints. (See paragraphs 1 and 2 on page 13.)</p>
<p>Q14A. (ASKED ONLY IF THE CUSTOMER INDICATES S/HE HAS COMPLAINED) How well, or poorly, was your most recent complaint handled? Using a 10-point scale on which “1” means “handled very poorly” and “10” means “handled very well,” how would you rate the handling of your complaint?</p>	<p>This question is a follow-up rating question.</p>
<p>Q14B. (ASKED ONLY IF THE CUSTOMER INDICATES S/HE HAS COMPLAINED) Using a 10-point scale on which “1” means “very difficult” and “10” means “very easy,” how difficult or easy was it to make a complaint?</p>	<p>This question is a follow-up rating question.</p>

Question	Supporting Rationale (See Pages 7 – 17 in the attached methodology paper)
Q15. If asked, how willing would you be to say positive or good things about the job the [AGENCY] is doing in [SPECIFIC SERVICE]? Using a 10-point scale on which “1” means “not at all willing” and “10” means “very willing,” how willing would you be to say good things about the agency’s handling of [SPECIFIC SERVICE]?	This question focuses on a desired outcome/future behavior and functions as an indicator of the consequence of satisfaction. (See <i>paragraph 4 on pages 16-17.</i> )
Q16. How confident are you that [AGENCY] will do a good job in the future of providing [SPECIFIC SERVICE]? Using a 10-point scale on which “1” means “not at all confident” and “10” means “very confident,” how confident are you that [AGENCY] will do a good job in the future providing [SPECIFIC SERVICE]?	This question focuses on a desired outcome/future behavior and functions as an indicator of the consequence of satisfaction. (See <i>paragraph 4 on pages 16-17.</i> )
QD1. – QD6. [AGE, EDUCATION, ETHNICITY, HOUSEHOLD INCOME LEVEL, AND GENDER DEMOGRAPHIC QUESTIONS]	Demographic questions are often useful to further analyze the responses of various subgroups within the population.

- 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 and specifically how this collection meets GPEA requirements.

The primary methods for data collection are telephone interviews and email invitations to take Internet-based surveys, as these methods generally result in maximum response rates. In fact, there has been a significant shift over the past few years to Internet-based surveys, currently comprising about 75% -- 80% of all survey data collections performed under this clearance. Increased use of automated technology is reducing the paperwork and burden related to ACSI surveys. For a number of reasons, including lower cost and improved timeliness, more of the data collection supporting these surveys is being accomplished through the Internet. The approach generally involves sending email invitations to customers based on information provided by agencies. To participate in the survey, customers activate the provided URL, which takes them to a website where the survey is presented and the data is collected. This technique streamlines the process of data collection, reduces paperwork, and cuts costs significantly. In addition, it emphasizes the voluntary nature of participating in a survey.

- 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.



Every effort is made to avoid duplicating similar surveys and survey questions. Generally, ACSI surveys are either new efforts or replace existing surveys in their entirety. Further, respondents for the survey are selected at random after having had a unique experience with an agency. Surveys are generally conducted only once annually from a sample of customers having an experience. Therefore, for most agencies, it is unlikely that individual respondents will be selected to complete more than one survey over an annual reporting cycle. Moreover, the ACSI model is specifically constructed to minimize the number of respondents required to provide a statistically significant result.

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

The collection of information will have no significant impact on small businesses or other small entities. If asked to participate in a survey, a small business could opt out very easily without penalty or pressure.

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.

Agencies that do not evaluate the customer satisfaction of their programs or services on a regular basis are at risk:

- They might focus on the wrong measures of success – the agency’s needs instead of the citizens’ needs.
- They will fail to be truly citizen-centric and provide the best possible citizen services as required by Executive Branch policy and directives.
- They will not see productivity gains and sufficient returns on their budgets to justify continuation of their programs to Congress, the Administration or the American people.
- Their cost of doing business will increase; resources will be less than optimally allocated.
- Citizen satisfaction will decline, which will lead to an overall decline in citizen trust in the Federal Government.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
  - \* requiring respondents to report information to the agency more often than quarterly;
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
  - \* requiring respondents to submit more than an original and two copies of any document;
  - \* requiring respondents to 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;
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- \* that includes 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
- \* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The FCG ensures that all parties involved with conducting ACSI surveys collect information under this clearance in a manner that complies with 5 CFR 1320.5(d) (2). There are no special circumstances of the above categories.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency'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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The FCG published a notice in the Federal Register [see attached Federal Register Notice document] on March 2, 2018, Volume 83, FRN 9022, as required by 5 CFR 1320.8(d) soliciting comments on the information collection prior to submission to OMB. No public comments were received.

Before beginning work on an ACSI survey, FCG and the client agency review the specific information need and determine whether the information is already available or can be collected efficiently by means other than a customer survey. If a survey is the only way to obtain current data efficiently, FCG collaborates with agency leaders to model those activities of most importance and develop a questionnaire that is concise and easy to complete. These questionnaires are prepared by survey experts and are thoroughly vetted by the agency conducting the survey to make sure that the instructions and questions are clear. ACSI surveys vary somewhat in length and complexity, but each is tailored to a specific group of customers and designed to fill a specific information requirement with minimum burden to all concerned. Any feedback received from respondents about a particular survey is incorporated in future

surveys. Refining a previously used survey is an essential step in conducting surveys undertaken on a periodic basis. Importantly, we ensure that collections occur at appropriate intervals. Seldom would FCG recommend that a survey be conducted more frequently than annually. Typically, one year is the amount of time that an agency needs to understand the results from a completed ACSI survey, develop strategies for improvement, and then implement specific changes that impact its interactions with the public as well as citizen perspectives about how the agency provides service.

Hundreds of ACSI surveys have been conducted by government agencies over the last 18 years. The public knows and trusts ACSI surveys and is generally enthusiastic about providing assessments and feedback on government services. The American people appreciate the fact these surveys are conducted by an independent third party, have statistical validity and are proactively used to improve services. Every ACSI survey represents an opportunity for consultation with citizens. We use this opportunity to gather important information about their experience in taking an ACSI survey.

The typical ACSI project involves a client agency providing a random sample of customers. As described elsewhere in this submission, data is often collected by telephone interviews with the interviewer entering the answers into an automated system. During the interview, the automated system captures a variety of helpful statistics, including the amount of time it takes each respondent to complete the survey.

Between April 5, 2018 and May 8, 2018, the following individuals were contacted:

- Staff Member - U.S. Pension Benefit Guaranty Corporation
- Staff Member – U.S. Department of Veterans Affairs
- Staff Member – U.S. Forest Services
- Staff Member – U.S. National Oceanic and Atmospheric Administration
- Staff Member – U.S. Citizenship and Immigration Services
- Staff Member – U.S. Department of State
- Staff Member – U.S. Department of Education
- Staff Member – U.S. Department of the Treasury

These users of the survey tools did not question the necessity of the collection or the quality, utility, and clarity of the information to be collected. Additionally there were no concerns expressed regarding the accuracy of the burden estimates.

In preparing this submission, we reviewed completion data from many recent surveys to determine an approximate amount of time that it takes for a respondent to answer all of the questions. Surveys do vary as illustrated by the examples above, but overall we estimate that an average ACSI survey takes 12 minutes to complete.

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

No payments or gifts will be made to respondents.

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

Individuals and organizations contacted in the course of conducting these surveys will be assured of the anonymity of their replies under 5 U.S.C. 552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. Survey respondents will be advised on the survey form or in a privacy statement that participation is voluntary.

Once data is collected from an individual or an organization, any personally identifiable information needed to contact customers is severed from the respondent record and is destroyed. No system of records is created.

All personnel involved in data collection who have access to individually identifiable information to conduct the survey are required to sign an oath swearing to maintain the anonymity of all survey respondents, under penalty of law and subject to possible termination, or criminal remedies for disclosure or allowance of disclosure.

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. This justification should include the reasons why the agency considers the questions necessary, the 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.

These customer satisfaction surveys will not ask questions or collect data of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. However, on occasion, some respondents may consider some demographic questions as sensitive in nature (e.g., questions that request the respondent's age, gender, education, or household income). Demographic questions are useful in segmenting the responses of different user groups or visitor profiles and helpful in evaluating the results; therefore, respondents will be encouraged to answer these questions but assured that their participation is completely voluntary.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- \* Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

Based on participation by Federal agencies and as new customer surveys are added or deleted.

However, based on our experience from the previous three-year approval period, the number of surveys has increased but at a very modest rate from 91 to 95 surveys currently.

It is estimated that 100 Satisfaction Surveys will be completed per year, yielding an estimated 80,000 responses per year (or 800 per survey). Since we have determined that each takes 12.0 minutes per response, the expected annual burden rate is 16,000 hours per year (or 80,000 responses X 12.0 minutes per response = 960,000 minutes/60 minutes per hour) .

- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* 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.

It is the general public that has used Government services that will, in the main be responding to these surveys. Therefore, we have taken as the hourly rate for total compensation of all civilian workers as \$35.87 per hour (\$24.49 in salaries and wages and \$11.38 in benefits), in accordance with Bureau of Labor Statistics (BLS) News Release [USDL-17-1646](#), December 15, 2017, Employer Costs for Employee Compensation—September 2017. The total compensation (\$35.87) multiplied by the estimated 16,000 hours per year, yields a cost burden to the public of \$573,920.

13. Provide an estimate of the total annual non-hour cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)
  - \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

There is no expected non-hour cost burden to respondents.

- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use

existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

We have identified no reporting or recordkeeping “non-hour” cost burdens for this collection of information.

- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The estimate of the total annual cost burden to the Federal Government resulting from the collection of information is expected to vary based on participation by federal agencies as customer segments are added or deleted, as customer measures are repeated, as volume discounts are negotiated, and as the ACSI is used to replace survey work that was previously done with other contractors or utilizing internal staff resources. Also, no assumptions have been made about cost increases over the three-year period. The total annual estimated cost to the Government to develop the 100 surveys and analyze their results is \$4,080,926, as explained below.

Please note that the majority of the costs are fees that Federal Agencies pay to the Department for assistance with the Survey development and implementation: -- \$37,000 per survey X 100 annual surveys = \$3,700,000. This cost covers what is paid to CFI Group to build and conduct the surveys as well as the costs to administer the contract with CFI Group. The remaining of \$380,926 is related to Federal staff time for implementation and analysis.

Here is a breakdown of the estimates for the average annual cost of implementation and analysis for the 100 surveys for fiscal years 2015 - 2017:

I. For Development of the Average Expected 75 Repeat Annual Surveys

0.02 FTE for Federal Agencies for estimated 75 Repeat Surveys at average GS-13, Step 3 rate for Washington, D.C. area, \$ 96,970 per year X 1.59 multiplier for benefits – .02. X \$96,970 X 1.59= \$3,084 per survey X 75 = \$231,300.

II. For Development of the Average Expected 25 New Surveys

.035 FTE for Federal Agencies for the estimate 25 New Surveys at

Average GS-13, Step 3 rate for Washington, D.C. area, is \$96,970 per year. This amount X 1.59 multiplier for benefits, or .035 X \$96,970 X 1.59 = \$5,396 per survey X 25 = \$134,900.

### III. For Analysis of Survey Results per 100 Expected Total Surveys

It is estimated that each agency spends approximately 2 hours analyzing the results received, at approximately the GS-13, Step 3 hourly rate for the Washington, D.C. area. Using current Office of Personnel Management information, this is \$46.62 per hour. Including the 1.59 multiplier to account for benefits yields an hourly rate of \$74.13. This rate of \$74.13 X 2 hours X the 100 surveys yields a total of \$14,826.

We used Office of Personnel Management Salary Table [2018-DCB](#) to determine the annual wages and multiplied the hourly wage by 1.59 to account for benefits in accordance with News Release [USDL-17-1646](#), December 15, 2017, Employer Costs for Employee Compensation—September 2017.

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

There are no program changes.

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 each survey, including an analysis and report of findings and key recommendations, will be released to each agency. If approved by the agency for release, ACSI scores for each customer project are announced to the public annually by the American Customer Satisfaction Index, Ann Arbor, MI 48108.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

No approval sought.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exception to the certification statement is being requested.