

DEPARTMENT OF THE TREASURY
ALCOHOL AND TOBACCO TAX AND TRADE BUREAU
Supporting Statement -- Information Collection Request
OMB Control Number 1513-0124

Information Collection Request Title:

Customer Satisfaction Surveys for Permit Applications, Permits Online (PONL), Formulas Online (FONL), and COLAs Online.

Information Collections Issued under this Title:

- Original Permit Application Customer Satisfaction Survey
- Amended Permit Application Customer Satisfaction Survey
- PONL Original Permit Application Customer Satisfaction Survey
- PONL Amended Permit Application Customer Satisfaction Survey
- Formulas Online (FONL) Customer Satisfaction Survey
- COLAs Online Customer Satisfaction Survey

A. Justification

1. What are the circumstances that make this collection of information necessary, and what legal or administrative requirements necessitate the collection? Also align the information collection to TTB's Line of Business/Sub-function and IT Investment, if one is used.

The Alcohol and Tobacco Tax and Trade Bureau (TTB) administers chapter 51 (distilled spirits, wine, and beer), chapter 52 (tobacco products, processed tobacco, and cigarette papers and tubes), and sections 4181-4182 (firearms and ammunition excise taxes) of the Internal Revenue Code of 1986, as amended (IRC, 26 U.S.C.), as well as the Federal Alcohol Administration Act (FAA Act, 27 U.S.C. 201 et seq.), pursuant to section 1111(d) of the Homeland Security Act of 2002, as codified at 6 U.S.C. 531(d). In addition, the Secretary of the Treasury has delegated certain IRC and FAA Act administrative and enforcement authorities to TTB through Treasury Order 120-01.

Among other things, various provisions of the IRC and the FAA Act require alcohol industry members to apply for and obtain: (1) Permits to operate, (2) approval of formulas for certain alcohol beverage products, and (3) certificates of label approval (COLAs) for alcohol beverages introduced into interstate or foreign commerce. The IRC also requires tobacco industry members to apply for and obtain operating permits. In addition to accepting paper forms for each type of approval request, TTB operates online application systems for permits—Permits Online (PONL), for formulas—Formulas Online (FONL), and for COLAs—COLAs Online. TTB customers access those online systems via the TTB website, TTB.gov, at <https://www.ttb.gov>.

In order to measure the effectiveness and quality of the service TTB provides to its customers, the agency conducts customer satisfaction surveys on a regular schedule. On a monthly basis, TTB sends via email an invitation to participate in a customer satisfaction survey to all applicants who submitted a new or amended permit application on paper or through PONL. On a quarterly basis, TTB sends via email an invitation to participate in a customer satisfaction survey to a statistically random sample of those who submitted an application through FONL or COLAs Online. Using a link in the email invitation, the customer may voluntarily complete the customer satisfaction survey online via the Survey Monkey website. That online system then aggregates and anonymously reports the survey results to TTB.

This information collection is aligned with:

Line of Business/Sub-function: General Government/Taxation Management.

IT Investment: No TTB IT investment. TTB uses an IT contractor to conduct and report results of customer satisfaction surveys.

2. *How, by whom, and for what purpose is this information used?*

TTB uses the information collected via these customer satisfaction surveys to evaluate the effectiveness of the Bureau's various applications, including its online application systems. The collected information allows TTB to judge customer satisfaction with its application forms and online systems, and to assess the need for improvements to them. The summarized results of these surveys may be reported to other interested parties within the Department of the Treasury.

3. *To what extent does this collection of information involve the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology? What consideration is given to use information technology to reduce burden?*

This information collection is conducted entirely by electronic methods. All alcohol and tobacco industry members who submit new or amended TTB permit applications, and randomly selected members of the alcohol industry members who submit formula or COLA applications are sent invitations via email to participate in a customer satisfaction survey. Using a link in the email invitation, the industry member may voluntarily complete the customer satisfaction survey online via Survey Monkey, a customer survey website used by a number of Federal agencies. Periodically, the Survey Monkey website aggregates and anonymously reports the results of the submitted surveys to TTB.

4. *What efforts are used to identify duplication? Can similar information already available be used or modified for use for the purposes described in Item 2 above?*

This information collection consists of customer satisfaction surveys. Answers to the survey questions are based on the experience of each individual respondent and are, therefore, unique to each respondent. As far as TTB can determine, similar information regarding customer satisfaction with TTB's various application forms and online systems is not available elsewhere.

5. *If this collection of information impacts small businesses or other small entities, what methods are used to minimize burden?*

TTB finds that these customer satisfaction surveys do not impose any significant administrative, cost, or response time burden on small businesses or small other entities. TTB notes that participation in its customer satisfaction surveys is voluntary and that these surveys are typically completed by individuals who wish to share their experience with TTB.

6. *What consequences to Federal program or policy activities and what, if any, technical or legal obstacles to reducing burden will occur if this collection is not conducted or is conducted less frequently?*

TTB uses the responses to these surveys to evaluate the experiences of its alcohol and tobacco industry customers using its permit, formula approval, COLA applications in order to improve those applications and the work done by the Bureau. If TTB did not conduct these surveys or conducted them less frequently, TTB would not be able to know the satisfaction level of its customers who submit such applications, and TTB would not be able to use that information to improve the quality of those applications.

7. *Are there any special circumstances associated with this information collection that would require it to be conducted in a manner inconsistent with OMB guidelines? (See 5 CFR 1320.5(d)(2).)*

There are no special circumstances associated with this information collection that would require it to be inconsistent with OMB guidelines.

8. *What effort was made to notify the general public about this collection of information? Summarize the public comments that were received and describe the action taken by the agency in response to those comments.*

To solicit comments from the general public, TTB published a "60-day" comment request notice for this information collection in the Federal Register on Monday, November 18, 2019, at 84 FR 63716. TTB received no comments on this information collection in response.

9. *Was any payment or gift given to respondents, other than remuneration of contractors or grantees? If so, why?*

No payment or gift is associated with this information collection.

10. *What assurance of confidentiality was provided to respondents, and what was the basis for the assurance in statute, regulations, or agency policy?*

No specific assurance of confidentiality is provided for the information collected by these TTB customer satisfaction surveys. However, while invitations to participate in a TTB customer satisfaction survey are sent via email to particular individuals or businesses,

TTB receives the results from Survey Monkey in aggregate and without any identifying respondent information such as name, email address, or IP address.

11. *What is the justification for questions of a sensitive nature? If personally identifiable information (PII) is being collected in an electronic system, identify the Privacy Impact Assessment (PIA) that has been conducted for the information collected under this request and/or the Privacy Act System of Records notice (SORN) issued for the electronic system in which the PII is being stored.*

This information collection contains no questions of a sensitive nature. This information collection also does not collect personally identifiable information (PII) in a Government electronic system. Therefore, no Privacy Impact Assessment (PIA) or System of Records Notice (SORN) is required for this collection.

12. *What is the estimated burden of this collection of information?*

Hour burden: TTB estimates that it will invite up to 20,000 respondents to participate in one of its customer satisfaction surveys per year, for a maximum total of 20,000 annual responses to this information collection. The resulting maximum estimated annual hour burden for this information collection is as follows:

Respondents	Responses/ Respondent	Total Responses	Time/Response	Total Burden Hours
20,000	1	20,000	12 minutes (0.2 hours)	4,000

Labor cost burden: TTB estimates the per-respondent and total respondent labor costs for this information collection as follows:

Labor Category	Fully-loaded Labor Rate/ Hour ¹	Time/ Response	Labor Cost/ Response	Total Responses	Total Labor Costs
Clerical & other unskilled workers			0		
Skilled-labor, craft labor, & other technical workers					
Professional & managers	\$44.30	12 minutes (0.2 hours)	\$8.86	20,000	\$177,200.00
Executives					
TOTALS	\$44.30	12 minutes (0.2 hours)	\$8.86	20,000	\$177,200.00

¹ Fully-loaded Labor Rate/Hour = Hourly wages plus benefits. Per the most recent U.S. Department of Labor, Bureau of Labor Statistics, data for National Industry-Specific Occupational Employment and Wage Estimates for NAICS 312000—Beverage and Tobacco Product Manufacturing, all Business and Financial Operations occupations, TTB estimates the fully-loaded labor rate for the professional and manager respondents to this information collection is \$44.30 per hour (\$30.76 wages and \$13.54 benefits). See: https://www.bls.gov/oes/current/naics3_312000.htm and <https://www.bls.gov/news.release/ecec.t04.htm>.

13. *What is the estimated annual cost burden to respondents or record keepers resulting from this information collection request (excluding the value of the hour burden in Question 12 above)?*

Responses to this voluntary information collection are very occasional and are collected from respondents via a cost-free third-party website. As such, there are no annualized capital, start-up, maintenance, operational, postal, or other costs to respondents associated with this information collection.

14. *What is the annualized cost to the Federal Government?*

The cost to TTB to use the Survey Monkey website to conduct the customer satisfaction surveys included in this information collection is \$3,000 per year. Based on the calendar year 2020 fully-load labor rate for GS-12, step 5, general schedule employees in the Washington, DC, locality pay area of \$76.41 per hour,² and an estimated 40 hours of time to annually administer this information collection and analyze the collected data, TTB estimates that its labor costs for this information collection are \$3,056.40 per year. As such, the estimated total cost to the Federal government for this information collection is \$6,056.40 per year.

15. *What is the reason for any program changes or adjustments reported?*

There are no program changes associated with this information collection. As for adjustments, due to changes in Bureau estimates resulting from a recent evaluation of the number of customer survey invitations sent to customers, TTB is decreasing the number of reported annual respondents to this information collection from 30,000 to 20,000. In turn, that reduction decreases of the total number of annual responses to this collection, from 30,000 to 20,000, and decreases of the estimated total annual burden hours, from 6,000 to 4,000.

16. *Outline plans for tabulation and publication for collections of information whose results will be published.*

Aggregate results of the customer satisfaction surveys conducted under this information collection are tabulated for use within TTB and the Department of the Treasury. However, TTB does not publically release the results of this information collection.

17. *If seeking approval to not display the expiration date for OMB approval of this information collection, what are the reasons that the display would be inappropriate?*

As a cost-saving measure for the agency, TTB request approval not to display the expiration date for OMB approval of this information collection on its customer satisfaction surveys. By not displaying the expiration date for this information collection,

² Federal Government Fully-loaded Labor Rate = Hourly wage plus benefits; calculated as hourly wage x 1.63. Therefore, Washington, DC, GS-12, step 5, hourly wage of \$46.88 x 1.63 = \$76.41 per hour (benefits = \$29.53 per hour). See <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/2020/general-schedule/> and <https://www.cbo.gov/sites/default/files/112th-congress-2011-2012/workingpaper/2012-04fedbenefitsswp0.pdf>.

TTB will not have to request that the administrators of the Survey Monkey website make such updates to the TTB customer surveys contained on that site. As a result, the TTB surveys will only require updating if and when TTB revises any of the surveys' questions.

18. *What are the exceptions to the certification statement?*

- (c) See item 5 above.
- (f) This is not a recordkeeping requirement.
- (i) No statistics are involved; TTB collects this information to verify and improve its customer service and its online application systems.

B. Collections of Information Employing Statistical Methods.

This information collection does not employ statistical methods.