May 12, 2020

Supporting Statement for
Paperwork Reduction Act Submissions

OMB Control Number: 1660 - 0107

Title: Public Assistance Customer Satisfaction Surveys

Form Number(s):
FEMA Form 519-0-32, Public Assistance Initial Customer Satisfaction Survey (Telephone);
FEMA Form 519-0-33, Public Assistance Initial Customer Satisfaction Survey (Internet);
FEMA Form 519-0-34, Public Assistance Assessment Customer Satisfaction Survey (Telephone);
FEMA Form 519-0-35, Public Assistance Assessment Customer Satisfaction Survey (Internet)

This is a request to revise 1660 – 0107 to accomplish the following goals: 1. Update Public Assistance Customer Satisfaction Surveys to reflect changes in the Public Assistance Program; 2. Allow for elaboration on key questions to better understand trends; 3. Improve clarity through simplifying survey questions and updating terminology; 4. Continue to measure customer satisfaction with Public Assistance process and gauge performance.

The information collection includes two surveys and qualitative research (focus groups/interviews).

The major changes are listed here and explained in more detail in Section A.12 and A.15

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information. Provide a detailed description of the nature and source of the information to be collected.**

The surveys align with the Department of Homeland Security (DHS) mission for the Federal Emergency Management Agency (FEMA) to ensure disaster resilience and with FEMA's 2018-2022 Strategic Plan.

The specific objective is 3.1 Streamline Disaster Survivor and Grantee Experience. Additionally, the surveys align with the FEMA Recovery Directorate's 2019 Strategic Plan and GPRA Performance Measure 3.1: Raise Applicant Satisfaction with Simplicity of the Public Assistance (PA) Process, Using Customer Survey Results. The measures include customer satisfaction with:

- Helpfulness of staff in guiding you through the PA process
- Simplicity of the PA process
- Overall satisfaction with the PA program

This information collection assesses customer satisfaction with the FEMA Public Assistance process. Applicants are surveyed at the beginning and end of the Public Assistance process. Applicants surveyed at the beginning of the process may be eligible or ineligible for funding, whereas applicants surveyed at the end of the process are eligible and have received funding for at least one of their projects.

The Public Assistance Initial (PAI) Survey assesses whether applicants are satisfied with the service and materials they receive from Public Assistance at the onset of the process. All applicants have a Recovery Scoping Meeting where their Program Delivery Manager sets expectations and provides timelines. Applicants receive important instructions and materials that can set the tone for the rest of the grant process. Applicants are eligible to participate in the PAI Survey after completing the Recovery Scoping Meeting.

The Public Assistance Assessment (PAA) Survey assesses customer satisfaction throughout the entire Public Assistance process. Survey topics include knowledge and helpfulness of FEMA representatives, timeliness of awards, simplicity of the process, reasonableness of requirements, accuracy of materials, satisfaction with communication, and usability of the Grants Portal. Applicants are eligible to participate after receiving funds for at least one of their projects.

Specialized qualitative research (e.g., focus groups; interviews) may be conducted periodically to assess program areas or program changes that the Public Assistance surveys do not capture. These are usually based on a convenience sample and target population will vary depending on research question.

The following legal authorities mandate the collection of the information in this request:

The September 11, 1993 Executive Order 12862, "Setting Customer Service Standards," and its March 23, 1995 Memorandum addendum, "Improving Customer Service," requires that all Federal agencies ask their customers what is most important to them and survey their customers to determine the kind and quality of services the customers want and their level of satisfaction with existing services. The 1993 Government Performance and Results Act (GPRA) requires agencies to set missions and goals, and measure performance against them.

The E-Government Act of 2002 includes finding innovative ways to improve the performance of governments in collaborating on the use of information technology to improve the delivery of Government information and services.

The GPRA Modernization Act of 2010 requires quarterly performance assessments of Government programs for purposes of assessing agency performance and improvement, and to establish agency performance improvement officers and the Performance Improvement Council. Executive Order 13571 "Streamlining Service Delivery and Improving Customer Service" and its June 13, 2011 Memorandum "Implementing Executive Order 13571 on Streamlining Service Delivery and Improving Customer Service" sets out guidelines for establishing customer service plans and activities; plus it expands the definition of customer and encourages the use of a broader set of tools to solicit actionable, timely customer feedback to capture insights and identify early warning signals.

The Sandy Recovery Improvement Act (SRIA) of 2013 and the response provided by FEMA staff from all divisions during Hurricane Sandy, the Disaster Survivor Assistance (DSA) Program was formed to provide additional in-person customer service during the initial phase of the recovery process.

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. Provide a detailed description of: how the information will be shared, if applicable, and for what programmatic purpose.

FEMA's mission is to support the citizens of the United States and first responders to ensure that as a nation we work together to build, sustain, and improve our capability to prepare for, protect against, respond to, recover from, and mitigate all hazards. FEMA uses the collected information to measure customer satisfaction, to meet objectives, gauge and make improvements to increase customer satisfaction.

This collection includes the Public Assistance (PA) Customer Satisfaction Surveys, managed by the Recovery Directorate, through the Reporting & Analytics Division, Customer Survey & Analysis Section (CSA) of the Federal Emergency Management Agency.

The purpose of the Public Assistance Customer Satisfaction Surveys is to assess customer satisfaction with the Public Assistance Program, and to improve the quality of service for applicants (State, Local, Tribal government, and eligible Private Non-Profit organizations) who have been affected by a disaster. This collection of information has enabled FEMA Managers to garner customer feedback and satisfaction against standards for performance and customer service in an efficient, timely manner to help ensure that users have an effective, efficient, and satisfying experience with the Agency's process. This collection has allowed for ongoing, collaborative and actionable communications between the Agency and its stakeholders. Results from the previous Public Assistance (PA) collection have given FEMA the ability to identify weaknesses in the PA program, as well as given applicants an opportunity to voice their concerns.

The survey results from the previous collection have helped provide a more complete picture of the Public Assistance process. For example, both in the field and in our surveys, applicants have commented about the complexity of the PA process. Generally, satisfaction with the program is high, but satisfaction with PA program simplicity consistently trends the lowest. This includes areas such as documentation and program requirements. The Public Assistance Program continually tries to streamline their processes. The 428 Program, or fixed estimates, are meant to provide more flexibility to the applicant and get them the money they need faster. Additionally, the Public Assistance Program introduced the Grants Portal during the last information collection, and we were able to provide customer feedback on the new technology system. The survey results have helped initiate updates to the

Grants Portal, such as improved ease of access, and better understanding of the portal. Lower survey ratings for "explaining the PA Process to applicants" has also prompted changes in which information is presented to applicants. The surveys have also highlighted areas in which Public Assistance continues to excel, such as with general customer service and helpfulness of the PA representatives.

Reports are usually distributed by email to stakeholders, which includes Public Assistance Leadership and the Recovery and Analytics Branch. Reports are distributed on a quarterly basis, and include descriptive breakdowns of each question (e.g., means and percentages). Stakeholders may request reports more often than quarterly if they want to examine customer satisfaction for a given disaster, state, or FEMA Region. Additionally, there is a Tableau Dashboard that displays survey results (averages for select questions) that anyone in FEMA can access. The dashboards are refreshed on a monthly basis. Demographic items are primarily used to describe the sample, but statisticians may be asked to do more in-depth analysis using inferential statistics. This would most likely be if there was a significant drop in customer satisfaction from one quarter to the next, and stakeholders wanted to better understand the underlying causes. The reports are used to monitor performance and identify areas of possible improvement.

Specialized qualitative research is conducted at the request of Public Assistance leadership when a need arises, and funding is available. This type of research allows for flexibility to assess programmatic changes that surveys are unable to capture. Examples might include technological upgrades to the Grants Portal, or changes to existing programs like 428 Alternative Procedures. Qualitative research can also help inform survey development through identifying new topic areas that need to be assessed. Funding is usually limited, so sampling is often restricted to a few geographic regions. Focus groups are more feasible when applicants are densely packed in one area, whereas interviews are more practical when applicants are spread out over a geographic region.

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.

All survey responses are stored in the Customer Satisfaction Analysis System (CSAS) for easy retrieval, analysis, and reporting. The Customer Survey and Analysis Section (CSA) planned on incorporating internet administration in the previous information collection but were unable to do so because of a lack of software functionality.

The current plan is to have mixed mode administration (phone and electronic) for the revised information collection. CSA is in the process of acquiring software and an electronic capability is a requirement. Collection techniques include phone interviews and electronic submission of responses. Incorporating electronic administration will improve overall response rates, increase accessibility, and reduce overall costs of administration, and it will be important to examine the possibility of administration mode effects.

Applicant organizations responding to the FEMA Public Assistance Customer Satisfaction Surveys will be able to respond via phone call (computer assisted telephone interviewing) or a web-based link. When the software is available, applicants that have an email address on file will first receive an email invitation. If the applicant does not complete the survey via the web within a designated amount of time (approximately 2 weeks), interviewers will attempt to contact the respondent via phone.

Response rates for our PA surveys are high compared to industry average for customer satisfaction surveys, although it's unclear how response rates will differ by mode. Response rates for online administration are typically lower than phone administered surveys, but it is difficult to predict how much lower. For example, in a research study examining response rates by administration mode, telephone administered surveys produced the highest response rates (30.2%), whereas internet administered surveys had the lowest response rates (4.7%; Sinclair et al., 2012). In 2018, public opinion polls had a response rate of approximately 6-7% when administered by telephone (Kennedy & Hartig, 2019). Federally administered household surveys tend to have much higher response rates but can vary widely (for review, see Czajka & Beyler, 2016). Response rates differ depending on variables such as survey length, convenience of administration, who is administering the survey, the use of incentives, who the respondents are, and survey importance. For the past two years, the response rate for the Public Assistance Surveys is 51.70% (PAI-52.56%; PAA- 50.35%).

For the updated collection, internet completions are estimated to be around 17% of the entire collection, although that percentage could increase as time goes on. Phone completions are expected to be approximately 69% of this collection, with the final 14% coming from qualitative interviews (focus groups and interviews). If qualitative interviews are excluded from the calculations, we expect about 80% of the PA surveys to be phone administered and 20% of the surveys to be web administered. Allowing mixed-mode administration should improve response rates and reduce burden by allowing respondents to reply in their preferred administration method. Each administration method will have identical questions. The exception is qualitative interviews, which will vary depending on which program area needs to be assessed.

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 information gathered in the survey is not available from any other source. CSA meets with stakeholders to ensure the surveys are adequately assessing the Public Assistance Program and reflect current practices.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

There is no impact from this collection of information on small businesses or other small entities.

6. Describe the consequence to Federal/FEMA program or policy activities if the collection of information is not conducted, or is conducted less frequently as well as any technical or legal obstacles to reducing burden.

Failure to conduct the Public Assistance Customer Satisfaction Surveys would result in the absence of documentation about customer input on the quality and timeliness of disaster assistance for Public Assistance applicants. The survey results serve as a vital tool for measuring customer satisfaction and are a requirement of the Executive Orders 12682 and 13571, and resulting Memorandums for

"Streamlining Service Delivery and Improving Customer Service." The surveys also contribute to measuring FEMA's 2018-2022 Strategic Plan: 3.1 Streamline Disaster Survivor and Grantee Experience. If conducted less frequently, applicants may have difficulty recalling the specific aspects of the process if surveyed later (e.g., too much time has elapsed) and satisfaction scores may be distorted. Additionally, leadership would receive less timely customer feedback, which would lead to fewer actionable insights.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

(a) Requiring respondents to report information to the agency more often than quarterly.

(b) Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.

(c) Requiring respondents to submit more than an original and two copies of any document.

(d) Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years.

(e) 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.

(f) Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

(g) 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.

(h) Requiring respondents to submit proprietary trade secret, 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.

All special circumstances contained in item 7 of the supporting statement are not applicable to this information collection.

8. Federal Register Notice:

a. Provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice 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 agency in response to these comments. Specifically address comments received on cost and hour burden.

A 60-day Federal Register Notice inviting public comments was published on January 20, 2020, 85 FR 5461. No comments were received. s

A 30-day Federal Register Notice inviting public comments was published on June 19, 2020, 85 FR 37102. No comments were received.

b. 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.

Budget constraints have prevented FEMA from consulting with persons outside the agency.

Recovery Directorate and Public Assistance Program Managers were consulted for input about the data collected in the survey questionnaires and the reporting format. FEMA External Affairs was consulted regarding the use of plain language and clarity. Additionally, a statistician has reviewed the new survey collection to ensure respondent burden is minimized, while also maximizing survey reliability and validity.

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

Budget constraints have prevented FEMA from contracting to consult with Public Assistance applicants since FY2004 when FEMA's Recovery Directorate contracted to perform four focus groups to ensure that the information collected was meaningful to customers and the survey questions were clearly understood. Although not a direct consultation with respondents, members of Customer Survey and Analysis were deployed to Iowa in 2015 to learn about the Public Assistance New Delivery Model and observed Recovery Scope Meetings. This allowed for better understanding of procedures and aided with questionnaire development.

Although direct contact with customers has been minimal, applicants often provide comments or feedback when completing the Public Assistance Survey. This feedback has been thoughtfully reviewed and applied in revising the current survey collection. Performance Management Analysts have conducted comment analysis on the survey results to extract themes from text boxes and "other" response options to identify topics important to customers that aren't currently assessed. For example, a common critique of the PA program included "Lack of training in the Grants Portal." To better capture this information, we have added a question assessing whether respondents feel they received adequate training.

Customer Survey and Analysis also has a Quality Performance Team (QPT) that is responsible for monitoring phone interviewers. QPT was asked to review the new surveys and give feedback on things that might be difficult for interviewers to read, or for respondents to understand. Additionally, phone interviewers provided survey writers with feedback regarding which survey items were consistently confusing to respondents on the previous information collection. For example, we restructured the scale descriptions to improve sentence flow and reduce burden.

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

There are no payments or gifts to respondents for this data collection.

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

A Privacy Threshold Analysis (PTA) was completed by FEMA and adjudicated by the DHS Privacy Office on January 2, 2020.

The Privacy Impact Assessment (PIA) is covered under the Department of Homeland Security FEMA/PIA-035 Customer Satisfaction Analysis System (CSAS), approved by DHS on February 27, 2014 and the existing System of Records Notice (SORN), is DHS/FEMA-009 Hazard Mitigation, Disaster Public Assistance, and Disaster Loan Programs System of Records, 79 FR 16015 approved by DHS on March 24, 2014.

There are no assurances of confidentiality provided to the respondents for this information collection. Survey information is stored in the Customer Satisfaction Analysis System (CSAS), warehoused on secure FEMA servers.

11. Provide additional justification for any question 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.

There are no questions of a sensitive nature related to sexual behavior and attitudes, religious beliefs, or other matters that are commonly considered private in the surveys.

Some questions of a demographic nature are included to help identify whether certain groups of people vary in their satisfaction with the Public Assistance Program, although the questions aren't very personal or of a sensitive nature. Examples include how long the respondent has worked in their current position, whether they've applied for PA disaster assistance previously, and the number of personnel that worked on their PA project(s). It is possible that respondents with less resources (staff) and less relevant work experience interpret the difficulty associated with the Public Assistance Process differently from an applicant who is more experienced, or who has previously applied for Public Assistance. Asking these questions allow us to better identify whether we are serving all our customers equally, and whether our products and services need to be tailored to meet the needs of certain groups of people.

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

a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated for each collection instrument (separately list each instrument and describe information as requested). 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 desired. 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.

Read-aloud testing by FEMA interview staff was conducted to approximate average survey response times. Previous research in survey methodology suggests online surveys can be completed faster than telephone surveys (e.g., Szolnoki & Hoffmann, 2013; Duffy et al., 2005). Based on these findings, we estimate internet versions will be completed 2 minutes faster on average.

Therefore, estimated total survey response time is 10 minutes for the PA Initial Survey (Phone) with a skilled interviewer, and 8 minutes for the PA Initial Survey (Internet). Estimated total response time is 13 minutes for the PA Assessment Survey (Phone) with a skilled interviewer, and 11 minutes for the PA Assessment Survey (Internet). For qualitative research, focus groups typically take 2 hours to conduct, plus 1 hour for round trip travel time to the session, or 3 hours. Interviews typically take 1 hour to conduct with no travel time.

The surveys approved in the previous information collection have been active since the start of FY 2018. This marked a transition from administering one questionnaire to two PA Customer Satisfaction Surveys: PA Initial Survey and PA Assessment Survey. Response rates and population estimates were examined for both surveys for FY 2018-2019 to make the estimates for the revised collection.

Projected completions for the PA Initial Survey are based on an annual applicant population of 4,096 (eligible and ineligible applicants) and a 52.56% response rate, resulting in approximately 2,152 respondents. Projected completions for the PA Assessment Survey are based on an annual applicant population of 2,626 (eligible applicants only) and a 50.35% response rate, resulting in approximately 1,322 respondents. For more information about estimated universe and projected completions, see Question 1 in Supporting Statement B.

For each survey (excluding qualitative research), we expect about 20% to be completed via the internet, and about 80% to be completed via phone.

For the PA Initial Survey, internet completions are estimated by multiplying 20% by 2,152, which would result in approximately 430 completions. Phone completions are estimated by multiplying 80% by 2,152, which would result in 1,722 completions.

For the PA Assessment Survey, internet completions are estimated by multiplying 20% by 1,322, which would result in approximately 264 completions. Phone completions are estimated by multiplying 80% by 1,322, which would result in 1,058 completions.

Qualitative research is conducted on a request basis; there is no special schedule for implementation. These surveys may be conducted at the beginning or end of the Public Assistance Process depending on what type of information stakeholders are trying to gather. Completions for qualitative interviews were estimated from previous experience (see Q12b for more details). It is likely that participants in the qualitative interviews will have previously taken the PA Initial or PA Assessment Survey. This will depend at what point in the PA process qualitative interviews take place and the what topics are being researched. Qualitative interviews are used to gather more detailed information that cannot adequately be captured in a short, quantitative survey measure. This most often occurs when Public Assistance implements a new program or policy that isn't addressed in the surveys. Examples of potential qualitative topics include changes to 428 procedures (estimates based on fixed costs), comparing PA New Delivery Model to old delivery model, assessing changes in the Grants Portal, and state-led disasters.

In the Question 12 figure below, the total estimated annual burden is 1,902 hours based on following:

- 287 burden hours for PA Initial Survey-Phone (10 minutes*1,722 completions),
- 57 burden hours for PA Initial Survey-Internet (8 minutes*430 completions),
- 230 burden hours for PA Assessment Survey-Phone (13 minutes*1,058 completions),
- 48 burden hours for Assessment Survey-Internet (11 minutes*264 completions), and
- 1,280 burden hours for qualitative interviewing ((Focus Groups: 3 hours * 360 participants) + (Interviews: 1 hour * 200 participants)).

This estimate accounts for a total of 4034 completions across two surveys and qualitative research measures. Some respondents may only be surveyed once, while it is possible for others to participate on three separate occasions. Burden hours per respondent could range anywhere from 8-10 minutes on the low end (complete PA Initial Survey only) to roughly 3 hours and 23 minutes on the high end (complete PA Initial Phone- 10 min, PA Assessment Phone- 13 min, and 1 Focus Group- 3 hours). The majority of applicants will complete the PA Initial and PA Assessment Surveys by phone, which is a total of 23 burden minutes per participant.

b. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

Below, as well as in Question 12 figure, is a description of the universe and hour burden by survey instrument:

[FEMA Form 519-0-32] PA Initial Survey (Telephone) may be conducted and gathered by phone, with responses stored electronically. The number of responses collected by phone is estimated to be 1,722 or approximately 43% of the whole collection with an hour burden of 287. It has been estimated to take 10 minutes for the applicant to complete the survey with a skilled interviewer.

[FEMA Form 519-0-33] PA Initial Survey (Internet) may be submitted through an internet link, with responses stored electronically. The number of responses collected by internet link is estimated to be 430 or approximately 11% of the whole collection with an hour burden of 57. It is been estimated to take 8 minutes for the applicant to complete the survey online.

[FEMA Form 519-0-34] PA Assessment Survey (Telephone) may be conducted and gathered by phone, with responses stored electronically. The number of responses collected by phone is estimated to be

1,058 or approximately 26% of the whole collection with an hour burden of 230. It has been estimated to take 13 minutes for the applicant to complete the survey with a skilled interviewer.
[FEMA Form 519-0-35] PA Assessment Survey (Internet) may be submitted through an internet link, with responses stored electronically. The number of responses collected by internet link is estimated to be 264 or approximately 6% of the whole collection with an hour burden of 48. It is been estimated to take 11 minutes for the applicant to complete the survey online.

Qualitative research will most likely be conducted in person or by phone. For focus groups, the number of participants is estimated to be 360 with an hour burden of 1,080. The number of focus group participants was calculated by estimating 3 sessions with 12 applicants per focus group, in each of the 10 FEMA Regions (3 sessions*12 applicants*10 Regions= 360 participants). The length of each focus group is estimated to be 2 hours with an additional 1 hour round trip travel time, for a total of 3 hours per participant (360 participants*3 hours = 1,080 burden hours). For interviews, the number of participants is estimated to be 200 with an hour burden of 200. We estimated 200 hours based on 2 participants per 1 hour interview, with 10 interviews in each of the 10 FEMA Regions (2 participants*10 interviews*10 FEMA Regions = 200 hours). No travel time is required for applicants. The decision to conduct interviews vs. focus groups usually depends on the density of the target population (e.g., sometimes applicants are spread all over the state and it is not feasible to meet in a central location). These burden estimates are the same that were used in the previous collection, which was adequate to meet all requests from stakeholders. Because the Public Assistance Program is undergoing significant changes (e.g., New Delivery Model, more state-led disasters, changes to 428 policy, updates to Grants Portal), we anticipate requests from stakeholders to conduct qualitative research as their funding becomes available. That's a total of 560 completions with 1,280 burden hours for qualitative research and comprises approximately 14% of the whole collection.

c. Provide an estimate of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. NOTE: The wage-rate category for each respondent must be multiplied by 1.46 and this total should be entered in the cell for "Avg. Hourly Wage Rate". The cost to the respondents of contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 13.

See Question 12 figure below. For type of respondent, historical data (FY 2018-2019) shows 19% of Public Assistance applicants are non-profit institutions, and 81% are state, local, or tribal government. Projected number of respondents, burden hours, and respondent costs are calculated accordingly.

Question 12: Estimated Annualized Hour Burden and Costs							
Type of Respondent	**Form Name / Form Number**	**No. of Respondents**	**No. of Responses per Respondent**	**Avg. Burden per Response (in hours)**	**Total Annual Burden (in hours)**	**Avg. Hourly Wage Rate**	**Total Annual Respondent Cost**
Non-Profit institutions	Public Assistance **Initial** Customer Satisfaction Survey FEMA Form 519-0-32 (**Telephone**)	328	1	0.1667	55	$35.43	$1,949

State, Local or Tribal Government		1,394	1	0.1667	232	$63.49	$14,730
Sub-Total		1,722			287		$16,679
Non-Profit institutions	Public Assistance **Initial** Customer Satisfaction Survey FEMA Form 519-0-33 (**Internet**)	82	1	0.1333	11	$35.43	$390
State, Local or Tribal Government		348	1	0.1333	46	$63.49	$2,921
Sub-Total		430			57		$3,311
Non-Profit institutions	Public Assistance **Assessment** Customer Satisfaction Survey FEMA Form 519-0-34 (**Telephone**)	201	1	0.2167	44	$35.43	$1,559
State, Local or Tribal Government		857	1	0.2167	186	$63.49	$11,809
Sub-Total		1,058			230		$13,368
Non-Profit institutions	Public Assistance **Assessment** Customer Satisfaction Survey FEMA Form 519-0-35 (**Internet**)	50	1	0.1833	9	$35.43	$319
State, Local or Tribal Government		214	1	0.1833	39	$63.49	$2,476
Sub-Total		264			48		$2,795
Total	**Telephone and Internet**	**3,474**			**622**		**$36,153**
Other-Qualitative Surveys							
Non-Profit institutions	**Focus Groups** based on 12 participants per session, with 3 sessions for each of 10 regions. Each session lasts 2 hours, with an additional hour for travel (3 hours total).	68	1	3	204	$35.43	$7,228
State, Local or Tribal Government		292	1	3	876	$63.49	$55,617
Sub-Total		360			1,080		$62,845

Non-Profit institutions	**Interviews** based on 2 participants per 1 hour interview, with 10 interviews for each of the 10 regions. Travel not required. Total time 1 hour.	38	1	1	38	$35.43	$1,346
State, Local or Tribal Government		162	1	1	162	$63.49	$10,285
Sub-Total		200			200		$11,631
Total	**Qualitative Surveys**	**560**			**1,280**		**$74,476**
Total		**4,034**			**1,902**		**$110,629**

For Non-Profit Respondents: According to the U.S. Department of Labor, Bureau of Labor Statistics[1], the May 2019 Occupational Employment and Wage Estimates wage rate for Community and Social Service Occupations (Standard Occupational Classification 21-0000) is $24.27. Including the wage rate multiplier of 1.46[2], the fully-loaded wage rate is $35.43 per hour. Therefore, the estimated burden hour cost to respondents for non-profit institutions is estimated to be $12,790.23 ($35.43 x 361 hours).

For State, Local Government, or Tribal Respondents: The average wage rate category for Emergency Management Directors (Standard Occupational Classification 11-9161) is $39.68. Including the wage rate multiplier of 1.60[3], the fully-loaded wage rate is $63.49 per hour. Therefore, the estimated burden hour cost to respondents for State, Local or Tribal Government is estimated to be $97,838.09 ($63.49 x 1,541 hours).

Therefore, the total annual respondent cost is $110,629.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. (Do not include the cost of any hour burden shown in Items 12 and 14.)

The cost estimates should be split into two components:

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[1] Information on the mean wage rate from the U.S. Department of Labor is available online at: https://www.bls.gov/oes/tables.htm.

[2] Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2019." Available at http://www.bls.gov/news.release/archives/ecec_06182019.pdf. Accessed May 12, 2020. The wage multiplier is calculated by dividing total compensation for all workers of $36.77 by wages and salaries for all workers of $25.22 per hour yielding a benefits multiplier of approximately 1.46

[3] Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, March 2019. Available at http://www.bls.gov/news.release/archives/ecec_06182019.pdf. Accessed May 12, 2020. The wage multiplier is calculated by dividing total compensation for State and local government workers of $50.89 by Wages and salaries for State and local government workers of $31.75 per hour yielding a benefits multiplier of approximately 1.6

a. Operation and Maintenance and purchase of services component. These estimates should take into account cost associated with generating, maintaining, and disclosing or providing information. 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.

b. Capital and Start-up-Cost should include, among other items, preparations for collecting information such as purchasing computers and software, monitoring sampling, drilling and testing equipment, and record storage facilities.

Question 13. Annual Cost Burden to Respondents or Record-keepers				
Data Collection Activity/Instrument	***Annual Capital Start-Up Cost** (investments in overhead, equipment and other one-time expenditures)	***Annual Operations and Maintenance Cost** (such as recordkeeping, technical/professional services, etc.)	**Annual Non-Labor Cost** (expenditures on training, travel and other resources) * See Note below	**Total Annual Cost to Respondents**
Focus Group Travel	N/A	N/A	$12,420	$12,420

Annual Non-Labor Cost for travel to Focus Groups is based on US General Services Administration (GSA) mileage rate for Privately Owned Vehicles (POV) effective January 16, 2020 at $0.575 per mile. Maximum travel to the Focus Group not to exceed 30 miles one way or 60 miles round trip. Using this information, 60 miles roundtrip * 360 respondents = 21,600 miles @ $0.575 per mile = $12,420 annual cost for mileage.

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 have been incurred without this collection of information. You may also aggregate cost estimates for Items 12, 13, and 14 in a single table.

Annualized Cost to the Federal Government
Performance of Surveys, Analysis and Reporting, Recommendations for Improvement, Desktop Application of Survey Tools and Maintenance of Tools.

Survey Administration or Functions	Title and GS Level	Salary[1]	Number of Staff at GS Level	Fully Loaded Wage Rate 1.46 Multiplier[2]	Cost (for Salaries includes the Wage Rate Multiplier)	Percent of Time	Total Cost
Management, survey administration	Section Manager GS 14 Step 5	$131,695	1	1.46	$192,274.70	16.00%	$30,764
Administrative Assistant	Administrative Assistant GS 9 Step 5	$64,628	1	1.46	$94,356.88	16.00%	$15,097
Program Analyst	Program Analyst GS 12 step 5	$93,724	2	1.46	$273,674.08	16.00%	$43,788
Supervisory, survey administration	Supervisory Customer Service Specialist GS 13 Step 5	$111,448	1	1.46	$162,714.08	16.00%	$26,034
Project management, administer survey program, recommend improvements, oversee reports and software application implementation, testing and maintenance of survey tools	Customer Satisfaction Analyst GS 12 Step 5	$93,724	4	1.46	$547,348.16	16.00%	$87,576
Statistician: OMB compliance, data analysis and reporting.	Customer Satisfaction Analyst GS 12 Step 5	$93,724	2	1.46	$273,674.08	16.00%	$43,788
Supervisory, Survey Administration	Supervisory Customer Service Specialist GS 12 Step 5	$93,724	1	1.46	$136,837.04	16.00%	$21,894
Survey Management: Administer surveys and focus groups, prepare sample, track data, analyze survey data, write reports and recommend improvements, software application implementation, testing and maintenance of survey tools and survey	Customer Service Specialist GS 11 Step 5	$78,192	7	1.46	$799,122.24	16.00%	$127,860

Supervisory, QC, Training Administration	Supervisory Customer Service Specialist GS 11 Step 5	$78,192	1	1.46	$114,160.32	16.00%	$18,266
QC, Training	Customer Service Specialist GS 11 Step 5	$78,192	2	1.46	$228,320.64	16.00%	$36,531
Supervisory, Survey Administration	Supervisory Customer Service Specialist GS 12 Step 5	$93,724	2	1.46	$273,674.08	16.00%	$43,788
Survey Interviews and special projects	Customer Service Specialists GS 9 Step 5	$64,628	14	1.46	$1,320,996.32	16.00%	$211,359
Subtotal			38		***$4,417,152.62***	16.00%	$706,745
Other Costs							
Contract for Focus Group Incentives and Rental Facilities					$149,273.84	19.00%	$28,362
Facilities **[cost for renting, overhead, etc. for data collection activity]**					$75,590.74	16.00%	$12,095
Computer Hardware and Software **[cost of equipment annual lifecycle]**					$218,381.00	16.00%	$34,941
Equipment Maintenance **[cost of annual maintenance/service agreements for equipment]**					$31,446.75	16.00%	$5,031
Travel (to Focus Group when not on Disaster Funds)					$43,514.94	19.00%	$8,268
Other: Long Distance Phone Charges **[number of data collections by phone, x minutes, x cost]**					$19,611.09	16.00%	$3,138
Other: C3MP Usage / Licenses					$28,296.48	16.00%	$4,527
Other: Supplies					$3,229.24	16.00%	$517
Subtotal					*$569,344.07*		$96,879
Total							$**803,624**

[1] Office of Personnel Management 2020 Pay and Leave Tables for the Dallas-Ft. Worth, TX-OK locality. Available online at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DFW_h.aspx. Accessed May 12, 2020.
[2] Wage rate includes a 1.46 multiplier to reflect the fully-loaded wage rate.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I in a narrative form. Present the itemized changes in hour burden and cost burden according to program changes or adjustments in Table 5. Denote a program increase as a positive number, and a program decrease as a negative number.

*A "**Program increase**" is an additional burden resulting from a federal government regulatory action or directive. (e.g., an increase in sample size or coverage, amount of information, reporting frequency, or expanded use of an existing form). This also includes previously in-use and unapproved information collections discovered during the ICB process, or during the fiscal year, which will be in use during the next fiscal year.*

*A "**Program decrease", is a reduction in burden because of: (1) the discontinuation of an information collection; or (2) a change in an existing information collection by a Federal agency (e.g., the use of sampling (or smaller samples), a decrease in the amount of information requested (fewer questions), or a decrease in reporting frequency).*

*"**Adjustment**" denotes a change in burden hours due to factors over which the government has no control, such as population growth, or in factors which do not affect what information the government collects or changes in the methods used to estimate burden or correction of errors in burden estimates.*

The revised surveys in this collection are comparable to the previously approved surveys. Both collections include two surveys (PA Initial and PA Assessment) with similar content. In the previous collection we accounted for internet administration. We were unable to administer the survey via a web link due to a lack of survey software functionality. We are currently in the process of acquiring new survey administration software and an electronic capability is a requirement. The survey software should be operational before the revised collection is approved, so the internet forms are included.

The revised collection has the same purpose and assesses the same subject matter. The target populations are still the same, and we attempt to survey everyone within the target population. We have updated some of the language and added questions to reflect programmatic changes and better assess performance measures. The length of the surveys has increased slightly, but overall burden has decreased due to lower overall disaster activity (FY 2018-2019) and lower response rates (adjustments).

***Total Change in Burden Hours (Adjustment)* = 1,902 (current) – 2,093 (previous) = (-191 hours)**

The overall burden change for the Public Assistance Surveys is largely due to population adjustments, which resulted in a decrease to burden hours. The previous population estimations included years with very high disaster activity. The current collection uses FY 2018-2019 for population and response rate calculations because those are the years in which we have historical data for both surveys. We only had one PA customer satisfaction survey prior to FY 2018. The current collection assumes a 52.56% response rate for the PAI Survey and a 50.35% response rate for the PAA Survey, which is a considerable decline from the previous collection (70.17%). In general, response rates for telephone surveys have been declining over the past several decades (Kennedy & Hartig, 2019; Curtin et al., 2005). Possible explanations for the response rate decline include a growing refusal among respondents to participate and difficulties in contacting individuals due to the increased use of answering machines, call screening devices, and cellular telephones (Tourangeau, 2004; Ehlen & Ehlen, 2007). In addition, new technologies sometimes mistakenly flag survey calls- even those conducted by the government- as "spam" (Kennedy & Hartig, 2019). As a result, lower population estimates and response rates led to a decrease in estimated burden for the revised collection. It is important to note that disaster activity can vary greatly from year to year, so population sizes can shift rather easily. Despite population shifts, the goal is always to survey the entire qualified population.

Typically, sample for both surveys will be pulled in on a monthly basis. Periodically, sample may be pulled in on a bi-weekly basis depending on disaster activity and survey administration needs. Applicants who completed a Recovery Scoping Meeting will be eligible to take the Public Assistance Initial (PAI) Survey. Applicants who had funds obligated for at least one of their projects will be eligible for the Public Assistance Assessment (PAA) Survey. Applicants who participated in 428 for one of their projects (received funds in the beginning of the process) or had a specialized project (increased completion time/complexity) may be placed on hold for surveying. Ideally these applicants will be surveyed closer to the end of the PA process to get a more accurate representation of satisfaction.

Survey administration time has increased for both surveys due to the following:

- The addition of questions assessing satisfaction with the key aspects of the 428 Alternative Procedures program (e.g., fixed estimates).
- There has been an increase in state-led disasters, which includes varying FEMA involvement. The survey language was modified so that all questions are understandable if the applicant interacted primarily with FEMA or State personnel. Questions were also added to understand the extent applicants worked with State and local emergency management.
- Questions were added to measure key performance metrics of timeliness, simplicity, and accuracy.
- Concepts that frequently appeared in comments were added to the survey.
- Text boxes were added to some of the questions that have trended lower so that applicants can provide more information about their experience.

15a) Change in Annual Hour Burden by Instrument:

- **PA Initial (Phone)** has an estimated:
  - 287 hours currently – 316 hours previously = -29 hours.
  - *Adjustment due to lower response rates and population estimates.*

- **PA Initial (Internet)** has an estimated:
  - 57 hours currently - 53 hours previously = +4 hours.
  - *Program increase due to longer administration time.*
  - *Note*- The population decrease for the PAI Survey was of a smaller magnitude than the population decrease for the PAA Survey. Internet administration forms also have a smaller proportion of applicants compared to telephone forms. Together, these factors resulted in the increased survey length for PAI Initial (Internet) having a stronger effect on burden hours (slight increase) compared to the other forms.

- **PA Assessment** (**Phone**) has an estimated:
  - 230 hours currently - 372 hours previously = -142 hours.

- *Adjustment due to lower response rates and population estimates.*

- **PA Assessment (Internet)** has an estimated:
  - 48 hours currently - 72 hours previously = -24 hours.
  - *Adjustment due to lower response rates and population estimates.*

- For **qualitative research (focus groups and interviews),** annual burden hours are:
  - 1280 hours currently – 1,280 hours previously = no change
  - *No Change.* The Public Assistance process is constantly evolving, and qualitative interviews add much needed flexibility when it comes to gaining insights into customer satisfaction with specific changes that aren't captured in the surveys. There are often changes to things like Alternative Procedures, the Grants Portal, New Delivery Model, and State-Led Disaster Framework that Public Assistance needs immediate feedback on. Interviews are useful because it is sometimes difficult to gather enough respondents in a concentrated area to conduct Public Assistance Focus Groups.

  - Breakdown: Focus Groups*:* 1,080 currently – 1,080 previously = -no change.
    Interviews*:* 200 currently - 200 previously = no change.

Question 15 a: Itemized Changes in Annual Hour Burden							
Data Collection Instrument	**Program Change (hours currently on OMB Inventory)**	**Program Change (New)**	**Difference**	**Adjustment (hours currently on OMB inventory)**	**Adjustment (new)**	**Difference**	**Explanation**
Public Assistance Initial Survey FEMA Form 519-0-32	0	0	0	316	287	-29	Adjustment due to lower population estimates and response rates
Public Assistance Initial Survey FEMA Form 519-0-33	53	57	4	0	0	0	Program increase due to longer administration time
Public Assistance Assessment Survey FEMA Form 519-0-34	0	0	0	372	230	-142	Adjustment due to lower population estimates and response rates

Now Public Assistance Assessment Survey FEMA Form 519-0-35	0	0	0	72	48	-24	Adjustment due to lower population estimates and response rates
Qualitative Interviews	0	0	0	1,280	1,280	0	No change
Total	53	57	4	2,040	1,845	-195	
Grand Total for adjustments and program change				**2,093**	**1,902**	**-191**	

15b) Change in Annual Cost by Instrument (see table 15b on following page)

- **PA Initial (Phone)** is a has an annual decrease of $3,998. *Adjustment due to lower population estimates, lower response rates, and decrease in wage rates.*

- **PA Initial (Internet)** has an annual decrease of $165. *Program change: slight increase in burden hours, but a decrease in costs due to lower wage rates.*

- **PA Assessment** (**Phone**) has an annual decrease of $10,987. *Adjustment due to lower population estimates, lower response rates, and decrease in wage rates.*

- **PA Assessment (Internet)** has an annual decrease of $1,922. *Adjustment due to lower population estimates, lower response rates, and decrease in wage rates.*

- For **qualitative interviews** there is an annual cost decrease of $9,312. *Adjustment due to decrease in wage rates*. Instead of using management occupations to estimate State, Local, or Tribal Government workers, we used emergency management directors, which is more representative of our population. There was no distinct Non-Profit category on the last published BLS wage estimate report for May 2019, so estimates were used for all community and social service occupations.

  - Wage Increase for Non-Profit Workers: $46.73 previously, $34.43 currently (includes 1.46 multiplier).
  - Wage Increase for State, Local, or Tribal Government: $67.54 previously, $63.49 currently (includes 1.6 multiplier).

- **For the total collection, there is a cost decrease of $26,383 (see table 15b).**

Question 15 b: Itemized Changes in Annual Costs							
Data Collection Instrument	**Program Change (costs currently on OMB Inventory)**	**Program Change (New)**	**Difference**	**Adjustment (costs currently on OMB inventory)**	**Adjustment (new)**	**Difference**	**Explanation**
Public Assistance Initial Survey, FEMA Form 519-0-32 Telephone	$0.00	$0.00	$0.00	$20,677	$16,679	-$3,998	Adjustment due to lower response rates, population estimates, and wage rates
Public Assistance Initial Survey, FEMA Form 519-0-33 Internet	$3,476	$3,311	-$165	$0.00	$0.00	$0.00	Program change in costs: longer survey administration time, but lower wage rates resulted in slightly lower costs
Public Assistance Assessment Survey FEMA Form 519-0-34 Telephone	$0.00	$0.00	$0.00	$24,355	$13,368	-$10,987	Adjustment due to lower response rates, population estimates, and wage rates
Public Assistance Assessment Survey FEMA Form 519-0-35 Internet	$0.00	$0.00	$0.00	$4,717	$2,795	-$1,922	Adjustment due to lower response rates, population estimates, and wage rates
Qualitative Interviews	$0.00	$0.00	$0.00	$83,788	$74,476	-$9,312	Adjustment due to lower wage rates
Total	$3,476	$3,311	-$165	$133,537	$107,318	-$26,219	
Grand Total for adjustments and program change				**$137,012**	**$110,629**	**-$26,383**	

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.

FEMA does not intend to publicly publish results from this information collection.

We will be providing reports to Public Assistance management and Headquarters management on a quarterly basis. These reports will have a breakdown of each question (basic descriptive statistics; averages and percentages) as well as an overall analysis of patterns seen in the data each quarter and trends overtime. Data can also be broken down by region, disaster, state, etc., depending on the needs of Public Assistance; so, it is possible that stakeholders will occasionally request reports on a more frequent basis than quarterly.

There is also a Public Assistance Tableau Dashboard on the Customer Survey and Analysis Website that can be accessed by anyone in FEMA. The dashboard is refreshed on a monthly basis. The dashboard displays averages for a subset of survey questions.

Statisticians may be asked to do more in-depth analysis if there is a significant drop in customer satisfaction scores, and stakeholders want to understand why there was a decrease in satisfaction. This may involve correlation, T-tests, Crosstabs with Pearson's Chi-Square, and Analysis of Variance (ANOVA). Demographic data will typically be used to describe the sample of respondents, but statisticians may also look for differences in satisfaction across demographic groups if a more in-depth analysis is requested.

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

FEMA will display the expiration date for OMB approval of this information collection.

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

FEMA does not request an exception to the certification of this information collection.

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