

SUPPORTING STATEMENT – PART A

U.S. ARMY CORPS OF ENGINEERS CUSTOMER SERVICE SURVEY OMB Control Number 0710-0012

1. Need for the Information Collection

In compliance with Executive Order (EO) 12862 (FY95) 'Setting Customer Service Standards' the US Army Corps of Engineers (Corps) began conducting annual surveys to assess the quality of services delivered to its Regulatory Program customers. This EO in section 1b, notes the federal government should survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services. The customer service survey was developed to assess the level of satisfaction of our customers (applicants) and to leverage any results received that contain recommendations on the application process. The survey provides feedback that would allow districts to compare satisfaction at their district over time. There is an interest in using customer satisfaction results to assess performance for improvement encompassing a) comparative benchmarking, b) identification of best-in-class projects, and c) sharing of best business practices used by best-in-class projects, would be well received in the field.

Without this survey the Corps would have to rely on less structured, informal methods of obtaining public input. The questionable scientific validity of such anecdotal data is well understood by this agency. Employment of a uniform data collection process will produce reliable information so that customer satisfaction may be measured across all districts. The ongoing administration of the survey allows Corps managers to monitor trends in customer satisfaction which serve as leading indicators of declining or improving delivery of Corps Regulatory services.

The primary purpose of this information collection is to gauge the customer service they receive when a permit or jurisdictional determination is provided to applicants pursuant to these statutory authorities using ENG Form 5065 (Customer Service Survey – Regulatory Program, US Army Corps of Engineers). The Corps of Engineers (Corps) is required by three federal laws, passed by Congress, to regulate construction related projects in United States (U.S) waters, which is accomplished through the review of applications for permits to conduct this work. The information is necessary to evaluate applicants' requests for a Corps permit for: (1) a dredging or construction related activity that would affect navigable waters of the U.S. under Section 10 of the Rivers and Harbors Act of 1899 (33 USC 403); (2) the discharge of dredged or fill material into "waters of the U.S," a broader geographic scope than navigable waters, under Section 404 of the Clean Water Act (33 USC 1344); and (3) a permit for the transportation of dredged or fill material for the purpose of ocean, disposal under section 103 of the Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act) (33 USC 1413). The Corps implementing Code of Federal Regulations is codified at 33 CFR 320 -332.

2. Use of the Information

There is one survey questionnaire used by the Corps Regulatory Program (ENG form 5065 Customer Service Survey Form) which has been revised to reduce the number of questions asked. This survey is a fillable pdf and survey responses are collected electronically and stored on a secure server behind the firewall with limited access. Respondents access the survey via the internet. A website link is provided on correspondence to applicants and some districts include this information in their emails. It is also available on district and HQ website and can be referenced in outreach materials. The Corps will collect the information from surveys of customers served by our district offices, currently a total of 38 offices. Only voluntary opinions will be solicited and no information requested on the survey instrument will be mandatory.

The Corps invites the public to take complete the Customer Service Survey when they receive a regulatory product, primarily a permit decision or wetland determination. The information collected is used to assess whether Regulatory business practices or policies warrant revision to better serve the public. A request to complete the survey is provided on Corps responses to jurisdictional requests, issued/verified permits, and email correspondence. To ensure the highest response rate possible, customers are encouraged to complete the survey electronically; however, a hard copy (which would be a printed version of the web-based form) may be provided upon request. Any hardcopy provided would also include the website address above so respondents can submit feedback via a web-based version of the survey if desired. The web-based version may be perceived as less burdensome by customers. Over the past couple years, all surveys have been completed electronically.

This information is included in the use of technology section and may also answer the postage question. Surveys are all completed online. The respondent reviews the questions, clicks on the desired responses and then submits the survey. This information is then stored electronically in a central server on the USACE network. Information collected can only be accessed by a few developers that uses the information to make any needed modifications to the form, and two people that can access results. These all required userids and passwords. We have one primary proponent that then strips off any identifying information that may have been added and sends the results in a spreadsheet format to district Regulatory Chiefs that request the results on a monthly basis.

After all the information is submitted by respondents, it then gets reviewed on a monthly and annual basis. The main take away item is the result of the responses to question 9 – "What is your OVERALL rating of the level of service provided by the Corps of Engineers Regulatory Program?" The average for the year is then computed. The results of this survey is used to assess the overall program to determine if modifications to practices and policies warrant revision to better serve the public.

3. Use of Information Technology

Although the survey is very short and can include a return address and postage the reduction in burden may not be viewed as significant. Survey responses will be transmitted (by mail/electronically) to a centralized Corps Headquarters database. The Corps has streamlined the form for this submission. Although over the past couple years all surveys have been completed electronically, the option to use and submit a hardcopy is still available when requested; therefore, we estimate that approximately 99% of these surveys are completed electronically. Hardcopy results will be entered for the applicant and stored electronically. We envision this percent will continue as the form is revised (requested in this extension of time request) and more user friendly web based technology becomes available. Web address for the survey is <https://regulatory.ops.usace.army.mil> and a word document version of the form is also being provided in the PRA package.

4. Non-duplication

The information obtained through this collection is unique and is not already available for use or adaptation from another cleared source.

5. Burden on Small Business

This information collection does not impose a significant economic impact on a substantial number of small businesses or entities.

6. Less Frequent Collection

Without conducting this survey, the Corps cannot comply with Executive Order 12862 or otherwise obtain reliable data to evaluate customer satisfaction with regulatory services. The survey must be administered throughout the year to ensure all major groups of customers are represented. This is due to the nature of the delivery of regulatory services i.e., the customer base varies widely across each year and each regulatory action typically involves only one short-term interaction with customers.

7. Paperwork Reduction Act Guidelines

This collection of information does not require collection to be conducted in a manner inconsistent with the guidelines delineated in 5 CFR 1320.5(d)(2).

8. Consultation and Public Comments

Part A: PUBLIC NOTICE

A 60-Day Federal Register Notice (FRN) for the collection published on Friday, February 26, 2021. The 60-Day FRN citation is 86 FR 11737.

No comments were received during the 60-Day Comment Period.

A 30-Day Federal Register Notice for the collection published on Wednesday, April 21, 2021. The 30-Day FRN citation is 86 FR 20673.

Part B: CONSULTATION

Received public comments in the past and taken all comments into consideration.

9. Gifts or Payment

No payments or gifts are being offered to respondents as an incentive to participate in the collection.

10. Confidentiality

Privacy Act Statement: The identities of respondents will be protected. In fact, providing name and address information on the survey is strictly optional. The survey form explicitly states that no respondents will be identified by name or organization in any report of the results of the survey. To view the responses from the survey stored on a DoD server, a login and password are required and access is limited.

System of Record Notice (SORN): The information received is entered into our permit tracking database and a SORN has been completed (SORN #A1145b) and may be accessed at the following website: <http://dpcl.d.defense.gov/Privacy/SORNsIndex/DOD-wide-SORN-Article-View/Article/570115/a1145b-ce.aspx>

Privacy Impact Assessment (PIA): A PIA is required for this collection and was completed 13 Apr 2016. The PIA, Civil Works Business Intelligence, is currently under revision. A draft copy of the revised PIA has been provided with this package for OMB's review along with the current approved version.

Records Retention and Disposition Schedule: The records are only retained electronically, ARIMS: 1200 A: Quality Assurance and Quality Control
Disposition: Keep in current file area until no longer needed for conducting business, but not longer than 6 years, then destroy. Disposition Authority: N1-AU-07-13

11. Sensitive Questions

No questions considered sensitive are being asked in this collection.

12. Respondent Burden, and its Labor Costs

a. Estimation of Respondent Burden

1. ENG Form 5065 - U.S. Army Corps of Engineers Customer Service Survey

- a. Number of Respondents: 1,000
- b. Number of Responses per Respondent: 1
- c. Number of Total Annual Responses: 1,000
- d. Response Time: 10 minutes
- e. Respondent Burden Hours: 166.7 hours

2. Total Submission Burden (Summation or average based on collection)

- a. Total Number of Respondents: 1,000
- b. Total Number of Annual Responses: 1,000
- c. Total Respondent Burden Hours: 167 hours

The hourly burden is estimated at 10 minutes per response. These estimates include the time for reviewing instructions and completing and reviewing the collection of information. A maximum of approximately 60,000 annual responses could be received nationwide (information is included in the 60,000 permit authorization letters sent to applicants). Since these customers often feel the requirement to comply with federal laws on their property is an imposition, they often have strong opinions. Responses are lower than expected and automation advances may help increase the ease to fill out the survey and will provide more responses. Last FY, we received approximately 500 electronic responses and few hard copies. The annual burden for each of the next three years is expected to be 167 hours (1,000 responses*0.1667hours) per year. The 1,000 return rate estimate includes more responses as technological advances make completion of the form easier.

b. Labor Cost of Respondent Burden

1. ENG Form 5065 - U.S. Army Corps of Engineers Customer Service Survey

- a. Number of Total Annual Responses: 1,000
- b. Response Time: 10 mins
- c. Respondent Hourly Wage: \$25.72
- d. Labor Burden per Response: \$4.29
- e. Total Labor Burden: \$4,286.67

2. Overall Labor Burden

- a. Total Number of Annual Responses: 1,000
- b. Total Labor Burden: \$4,287

Cost to respondents is estimated using the current mean wage rate of \$25.72/hour (Bureau of Labor & Statistics May 2019 rate for All Occupations). There will be no other costs to respondents beyond their time. Only one survey form will be used.

https://www.bls.gov/oes/current/oes_nat.htm

13. Respondent Costs Other than Burden Hour Costs

There are no annualized costs to respondents other than the labor burden costs addressed in Section 12 of this document to complete this collection.

14. Cost to the Federal Government

Part A: LABOR COST TO THE FEDERAL GOVERNMENT

1. ENG Form 5065 - U.S. Army Corps of Engineers Customer Service Survey

- a. Number of Total Annual Responses: 1,000
- b. Processing Time per Response: 1 hour per month
- c. Hourly Wage of Worker(s) Processing Responses: \$45.01
- d. Cost to Process Each Response: \$45.01 per month
- e. Total Cost to Process Responses: \$540.12 per year

2. Overall Labor Burden to Federal Government

- a. Total Number of Annual Responses: 1,000
- b. Total Labor Burden: \$540.12

Part B: OPERATIONAL AND MAINTENANCE COSTS

1. Cost Categories

- a. Equipment: \$0
- b. Printing: \$0
- c. Postage: \$220
- d. Software Purchases: \$0
- e. Licensing Costs: \$0
- f. Other: \$475.20
- g. Total: \$695.20

2. Total Operational and Maintenance Costs: \$695.20

Part C: TOTAL COST TO THE FEDERAL GOVERNMENT

- 1. Total Labor Cost to the Federal Government: \$540.12
- 2. Total Operational and Maintenance Costs: \$695.20
- 3. **Total Cost to the Federal Government: \$1,235**

We estimate the total annual cost to the federal government to be approximately \$1,235. This accounts for the administration of the survey (12 hours per year - \$39.60/hour (compilation - BLS 2019 mean wage rate for web developer) for a total compilation cost of \$475.20) compilation and providing responses to all districts (IT services are estimated at 12 hours per year, \$45.01/hour (computer occupation - BLS 2019 mean wage rate for a total IT cost of \$540.12). Printing and mailing costs are minimal as most districts post the link to the customer service survey in permit and jurisdictional determination letters and

in email response to respondents. All district websites also contain a link to the online survey. Districts may mail a postage paid response forms to a few hundred respondents upon request (\$1.10 total - \$0.55 cents to send a letter and return postage of \$0.55) for a total cost ~\$220. Total cost of the government would be a sum of these costs - IT cost \$540.12, compilation cost \$475.20, and misc postage \$220): total cost to the government of \$1,235.32

15. Reasons for Change in Burden

This is a request for extension, with change, of a previously approved collection . The reduction in burden hours is primarily due to decrease in the estimated number of respondents, down from the 2,000 estimated in 2017. The number of responses has decreased since previous submittals due to a decrease in permit decisions. Furthermore, we have a more refined estimate in the number of submittals from previous submittals since responses are all electronic and we can quantify the number of submittals.

16. Publication of Results

The results of this information collection will not be published.

17. Non-Display of OMB Expiration Date

We are not seeking approval to omit the display of the expiration date of the OMB approval on the collection instrument.

18. Exceptions to "Certification for Paperwork Reduction Submissions"

We are not requesting any exemptions to the provisions stated in 5 CFR 1320.9.