

Department of Justice
Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF)
Information Collection Request (ICR)
OMB 1140-0101
National Firearms Act Division and Firearms and Explosives
Services Division Customer Service Survey

SUPPORTING STATEMENT

A. JUSTIFICATION

1. Explain the circumstances that make the information collection necessary.

The National Firearms Act Division (NFA Division) and Firearms and Explosives Services Division (FESD) provide services to the firearms and explosives industry regarding dealer licensing, and the importation and transfers of NFA weapons. To ensure NFA Division and FESD are providing the highest level of customer satisfaction, a form is provided to our customers to acquire their feedback about their experience with our services. Per the requirement of an internal audit, the use of this anonymous National Firearms Act Division and Firearms and Explosives Services Division Customer Service Survey allows NFA Division and FESD to gauge the level of customer satisfaction and identify any deficiencies for improvement.

2. Indicate how, by whom, and for what purpose the information is to be used.

The National Firearms Act Division and Firearms and Explosives Services Division Customer Service Survey was previously available to the public online but after June of 2023 was available only in paper form upon request by respondents. Now, ATF has developed an interim electronic replacement of a pdf fillable form available on ATF's website. Responses are submitted anonymously, unless a respondent willingly furnishes their name and contact information so that NFA Division and FESD management can contact them directly regarding any concerns raised. Participation in this feedback process is strictly voluntary and does not impact the service respondents receive from NFA Division or FESD. This form is intended to gather information about customer service provided by NFA Division and FESD throughout the firearms and explosives industry and improve customer satisfaction.

3. Describe whether, and to what extent, the information collection 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.

Responses to the National Firearms Act Division and Firearms and Explosives Services Division Customer Service Survey were collected online prior to June of 2023, through a link on either the National Firearms Act Division page or the Service Centers Contact page of the ATF.gov public website. The form was administered by an industry standard software that allowed collecting and sorting public responses by the corresponding NFA Division and FESD branches. The use of an electronic remission process allowed all responses to be easily sorted, and for staff to easily review and summarize them for resolution. The use of an online tool also reduced the public burden. However, the online information collection had to cease due to procurement and budget transitions. As a result, this information has been collected for the past year via a paper form, upon request. Now that printing the form and submitting by mail have been the primary methods for most customers during the past year, the monetized value of preparing and mailing these responses has increased. Additionally, electronic submission capability reduced both the federal government costs associated with printing and mailing paper forms, as well as the manpower hours required to review paper responses, so those costs have increased as well. However, ATF has created a new fillable form that will be available for download through a link on its website and may be submitted by email, in addition to the paper form. This will offset the public burden and cost of paper submissions. However, it will still entail the increased government time for processing. For all these reasons, ATF is working to reactivate the online version of the form.

4. Describe efforts to identify duplication.

ATF uses a uniform subject classification system to identify duplication and to ensure that any similar information already available cannot be used or modified for use for the purpose of this information collection (IC). No other forms or other collection instruments currently exist that meet this requirement.

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

There is no significant impact on small business or other private entities.

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.

This does not apply to this form renewal process.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner inconsistent with 5 CFR 1320.6.

There are no special circumstances associated with this information collection requirement, which is conducted in a manner consistent with 5 CFR § 1320.6.

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 describe actions taken by the agency in response to these comments.

No comments were received during the 60-day Federal Register (FR) notice period. However, a 30-day FR notice will be published to solicit public comments.

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

No payments or gifts are provided to respondents.

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

Confidentiality is not assured. Confidentiality is not required in the processing of this information collection.

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

No questions of a sensitive nature are associated with this information collection.

12. Provide estimates of the hour burden of the information collection.

In previous years, the estimated number of respondents, using an online-fillable and submitted form, has been 23,100. For the past year, this customer satisfaction feedback form has been moved from its online form into a paper form, available by request, filled by hand, and mailed to ATF, resulting in a decrease in annual respondents to 100.

ATF has now created a form that can be accessed by a link on our website, downloaded, filled out electronically, and submitted by email instead. ATF plans to implement this electronic alternative concurrent with this renewal request, and expects the annual number of respondents to increase substantially as a result, though not to the previous level. ATF estimates the current level of 100 responses will remain about the same for the first few months of this renewal period, then rise. Because there are more steps involved in this new electronic process than with the previous online-fillable/submittable process, because email submission might not provide as much anonymity as some respondents might prefer, and because it will take some time for respondents to become aware of the availability of the electronic fillable form, ATF is estimating annual projected responses after those first few months might rise to approximately 12,000, roughly half of the previous number of respondents, for the remainder of this renewal period.

ATF is working toward moving this form back to an online-fillable/submittable form within this three-year renewal period. Should the form be brought back online, ATF anticipates the number will rise to closer to 23,100 again, though anticipates that, if that occurs, it would be closer to the latter part of the three-year renewal period. Because this is unsure, ATF is not including this option in its cost estimates for this renewal period.

From a universe of 1,000,000 total NFA applications that were processed last year, only approximately 100 respondents have been mailing the customer satisfaction form due to the change in submittal process. As noted above, ATF anticipates this rate to continue in the early part of this renewal period. Each respondent responds once to this collection, so the total number of responses is also 100. Each respondent will take a total of ten minutes to complete and mail this form. Therefore, ATF estimates the total annual burden hours associated with this collection for the first year of this renewal period would be 8.33, which is calculated as follows: 100 (# of responses) \times 0.17 (10 minutes).

From the same 1,000,000 universe of total NFA applications processed last year, ATF estimates that during the second and third years of this renewal period, the annual number of respondents might rise to 12,000 respondents because of the shift to an electronic form. Each respondent responds once to this collection, so the total number of responses would also be 12,000. Each respondent would take five minutes (0.08 hours) to download, complete, and email this form. Therefore, ATF estimates the total annual burden hours associated with collection for the second and third years of this renewal period would be 960 hours, which is calculated as follows: $12,000$ (# of responses) \times 0.08 hours (5 minutes).

Based on the published Health and Human Services leisure wage calculation methodology, ATF estimates a leisure wage rate for customer service respondents of \$23 an hour (rounded). Therefore, ATF estimates the annual monetized value of respondent time associated with this information collection will range from \$391 the first year to \$22,080 each of the last two years. For the purposes of accounting for the monetized value of this information collection, therefore, ATF is using an annual estimated mid-point of **\$11,236** (rounded).

Table 2. Number of respondents, number of responses, hourly burden, and monetized value of time for respondents.

Activity	Number of respondents	Frequency	Total annual responses	Time per response	Total annual burden (hours)	Hourly rate*	Monetized value of respondent time
Customer satisfaction form – paper form	100	1	100	0.17 hour	17	\$23	\$391
Customer satisfaction form – fillable electronic form	12,000	1	12,000	0.08 hours	960	\$23	\$22,080
Unduplicated totals					17-960	\$23	\$391- \$22,080

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

There are/are no start-up costs associated with this collection. There is no additional cost burden to the respondents as customer service staff can capture respondents’ comments via email at no additional cost.

14. Provide estimates of the annualized cost to the federal government.

Government staff spend ten minutes per response to review and process the customer service responses. Government-wide, support staff processing activities range from an entry level federal employee between GS-5/7, upwards to GS-11. To determine an average wage rate for federal employees in the DC-area locality across these grades, ATF took the 2024 wage rates in the General Schedule (“GS”) for DC,¹ at each grade level, step 5, then averaged them for an average wage rate across these grades. The resulting average is \$34.12/hour. To account for fringe benefits such as insurance, ATF estimated a federal load rate. ATF estimated the load rate using the methodology outlined in the Congressional Budget Office’s report comparing federal benefits to private sector benefits. It states that federal benefits are 17 percent more than private sector benefits (or a multiplier factor of 1.17).² ATF calculated private sector benefits from the Bureau of Labor Statistics and determined that the overall private sector benefits are 41.6 percent in addition to an hourly wage, or a load rate of 1.416, making the federal load rate 1.66

¹ Office of Personnel Management, Salary Table 2023-DCB, available at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2024/DCB_h.pdf

² Congressional Budget Office, Comparing the Compensation of Federal and Private-Sector Employees, 2011 to 2015, available at <https://www.cbo.gov/system/files/115th-congress-2017-2018/reports/52637-federalprivatepay.pdf>.

above the hourly wage rate.^{3,4} Including benefits, therefore, the average hourly wage rate for the federal government, using grades 5 through 13, is \$56.64 per hour. We estimate 17 burden hours on an annual basis during the year in which we anticipate receiving 100 responses, for a cost of \$963 ($\$56.64 \times 17 = \963 (rounded)). We also estimate 2,040 burden hours on an annual basis during the year in which we anticipate receiving 12,000 responses, for a cost of \$115,546 ($\$56.64 \times 2,040 = \$115,546$). The total annual government cost from this ICR would therefore range from \$963-\$115,546.

15. Explain the reasons for any program changes or adjustments.

This significant change from last renewal's user population is due to disabling the online link and replacing it with a paper form and then an electronic form. ATF is working to reactivate the link in an online format. In addition, the increase from the last renewal is also due to ATF including a monetized value for respondent time burden and adding Federal costs for processing paper and electronic forms, which were not incurred with the online-fillable/submittable form. These changes are anticipated to temporarily decrease the number of respondents from 23,100 to 100 and increase costs from \$0 to \$391 in the first year, and to then increase the number of respondents back to about half the previous annual rate, or roughly 12,000, in the second and third years, from which ATF has derived a mid-point amount as the annual monetized value, resulting in a net increased cost from last renewal in these years from \$0 to \$11,236.

16. For information collections whose results will be published, outline plans for tabulations, and publication.

ATF does not plan to publish this information collection.

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.

ATF is not requesting an exemption.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This information collection does not employ statistical methods. However, because the customer service feedback form was done through an online survey tool and is expected

³ BLS Series ID CMU201000000000D,CMU201000000000P (Private Industry Compensation = \$41.62) / BLS Series ID CMU202000000000D,CMU202000000000P (Private Industry Wages and Salaries = \$29.35) = 1.417. BLS average 2024. U.S. Bureau of Labor Statistics, Database for Employee Compensation, available at <https://data.bls.gov/cgi-bin/srgate>.

⁴ 1.66 Federal load rate = 1.4 private industry load rate * 1.17 multiplier factor.

to resume online administration in future (though no survey or statistical analysis is involved), ATF is also submitting a part B supporting statement separately.