

SUPPORTING STATEMENT A
Generic Clearance for the National Cemetery Administration
Customer Satisfaction Surveys
OMB Control Number: 2900-0571

Note: Summary of Changes from Previously Approved Collection

- Customer Satisfaction Surveys – There is no change in the title.
- There are revisions to instruments of collection to add additional questions and renumber the questions.
- This ICR type is a revision as the total time burden increased by 2,500 hours to 26,158 hours.
- There were no received comments on the 60-day FRN.

A. JUSTIFICATION

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

In response to Executive Order 12862, “Improving Customer Service through Effective Performance Management”, the National Cemetery Administration (NCA) conducts surveys to determine the level of satisfaction with existing services among their customers. The surveys solicit voluntary opinions and are not intended to collect information required to obtain or maintain eligibility for a VA program or benefit. Baseline data obtained through these information collections are used to validate customer service standards. This submission is a request by NCA to the Office of Management and Budget (OMB) for the following approval:

- a. Grant NCA a three-year extension of its generic clearance authority;
- b. Allow NCA to establish a maximum number of annual burden hours against which burden will be charged for each survey used; and
- c. Allow for the submission of summary of objectives, specific burden estimates, and final survey instruments (focus group scripts, test questions, etc.) covered by the generic clearance from OMB (and inclusion in the OMB public docket) prior to their use.

2. Indicate how, by whom, and for what purposes the information is to be used; indicate actual use the agency has made of the information received from current collection.

NCA conducts an annual survey of satisfaction (also referred to as Customer Satisfaction Surveys) using four surveys targeted at participants engaging different aspects of VA’s burial and memorial programs: 1) National Cemeteries Next of

Kin/Family Member Satisfaction Survey, 2) State or Tribal Veterans Cemeteries Next of Kin/Family Member Satisfaction Survey, 3) VA Memorial Products Next of Kin/Family Member Satisfaction Survey, and 4) Funeral Director Satisfaction Survey.

The National Cemetery Administration continues to conduct customer satisfaction surveys under this generic clearance for the purpose of implementing the Executive Order. If surveys are not conducted, NCA is unable to comply with the Executive Order and will lack the information needed to improve established standards for the best possible customer focused service. NCA continues to use the information gathered to determine what services are satisfactory and meet customer needs and expectations. Additionally, NCA gains insight into areas for improvement. Based on analysis of response data and focus group findings, NCA has initiated a significant revision to survey instruments. This results in the elimination of questions deemed no longer relevant, and the addition of questions that address new opportunities.

By grouping, the count of recommendations are as follows:

Survey	Proposed New	Proposed Revision	Proposed Deletion
Methodology	2		
NC/Next of Kin	12	6	2
MPS	4	11	3
STVC	1	5	1
Funeral Director	2		1
Total	21	22	7

NCA is respectful of our request for the time of those responding to our surveys. For the three next of kin surveys (for national cemeteries, state or tribal cemeteries, and Memorial Products), there is no expectation of time investment for research, collecting documentation, or travel. The burden for funeral directors is slightly higher, calling for a count of the number of interment services supported and other details, but overall, this is not projected to be (nor has it been reported through focus groups) to be a significant burden. Third party consultation (through Federal Register notices) has demonstrated no significant respondent burden.

To date, NCA has used survey findings to inform strategic and operational plans and activities, to include relevant changes to how NCA conducts business and enhances how it serves Veterans and their families during their time of need, as well as supports funeral directors assisting Veterans and their families. Moreover, aggregates of survey findings inform budget submission and is a criterion considered in evaluating cemetery operations and staff. Moreover, internal survey operations are corroborated through a third-party vendor through the American Customer Satisfaction Index (ACSI) methodology. NCA efforts over the last few years have resulted in NCA achieving a 97-index score (out of 100) in 2022, repeating this extraordinary score first achieved in 2019 on the ACSI methodology, the highest score ever recorded for a public or private organization. This demonstrates how seriously NCA takes the customer's experience and feedback on NCA's surveys.

NCA surveys next of kin/family members of Veterans and their families interred at VA national cemeteries, State or Tribal Veteran cemeteries, or private cemeteries and using

VA memorial products, as well as the funeral directors assisting them, using mail surveys, focus groups, and comment cards. Participation in the surveys is voluntary and the generic clearance is not used to collect information required to obtain or maintain eligibility for a VA program or benefit. Voluntary customer surveys are not program evaluations and are not used as substitutes for traditional program evaluation surveys that measure objective outcomes. To maximize the voluntary response rates, the information collection is designed to make participation convenient, simple, and free of unnecessary barriers. To minimize the impact of the language barrier, surveys are offered in both English and Spanish. If the respondent receives a survey in the language in which they are not comfortable, there is a statement (i.e., the English language survey includes a statement in Spanish) inviting the respondent to request the alternative language survey instrument. Furthermore, the survey process is supported by a telephone help line. This help line is set up to respond to questions about the survey but has (as necessary) been used to allow the respondent to work with a trained interviewer to respond to the survey via the telephone. In the cover letter sent with the survey, respondents are also offered a Universal Resource Locator (URL) through which they can access and complete the survey on-line. Each survey includes a statement that "Failure to furnish the requested information will have no adverse effect on any VA benefit to which you may be entitled." NCA recognizes that this survey addresses events around a highly emotional and personal event – the death of a loved one. This organization works to minimize the potential psychological impact through allowing a minimum of a 90-day grieving period before a survey is mailed, ensuring that a respondent will only be contacted for one survey, and through maximizing the various opportunities (multiple languages, option for a paper or electronic survey response, a telephone help line) to minimize the burden on the respondent.

The National Cemetery Administration has found that the surveys help identify those aspects of services that are most important to its customers - Veterans and their families, and funeral directors. NCA requests that upon renewal of this approval from OMB, this generic ICR becomes a generic clearance that remains in place for the PRA's maximum approval period of three years. Individual surveys are sent to OMB for clearance as individual information collections ("IC") prior to collecting data. NCA shall track the usage of all collections approved under this clearance including instruments, methodology, respondents, and total burden hours to ensure compliance with the description of collections approved under this generic clearance.

Surveys developed under this generic clearance number contain questions like those that might be asked in the customer satisfaction surveys included in this Generic ICR package. Again, prior to use, each individual survey or IC requires a separate submission to OMB (through the generic ICR process, with a short OMB review) with the exact questions and with burden hours specified.

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.

Information technology is used wherever possible to reduce the information collection burden these activities place on the public. To date, NCA offers participants the option to respond via paper or by accessing an online uniform resource locator (URL) utilizing a unique identification (ID) assigned to them. The online URL is provided on the paper survey that participants receive in the mail. Since offering the online URL option for responding to surveys, NCA has found that most participants complete the paper version of the survey. All participants receive paper-based surveys. This customer requirement was derived through focus sessions with NCA customers. Customers (mostly elderly) felt that receiving a survey over the phone or electronically so soon after the death of a loved one would be insensitive, hurtful and impact on the grieving process. Using a paper survey ensured consistency in message and tone. Additionally, they noted that most NCA customers are elderly and do not have access to computers for electronic surveys.

NCA continues exploring options for the continuous improvement of both the survey process and questions. With this application for renewal, NCA is submitted revised questions which will better target the data collection to the needs of NCA.

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 NCA uses VA's internal review process to examine each information collection to prevent duplication of effort or redundancy in the information collected. No information currently being collected in VA can be used to meet the requirements of the Executive Order. The information gathered from the surveys overall, is unique and not available from any other sources.

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

Small businesses, such as directors of funeral homes, are involved in this collection of information. As with the next of kin surveys, funeral directors are provided an URL with a unique identifier to respond to the survey electronically.

6. Describe the consequences 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.

NCA has a reputation for maintaining its cemeteries as national shrines. Key to a high-quality burial program is the emphasis on perpetual care of cemetery grounds to ensure Veterans, their families, and Americans at-large, have a place to pay their respects and honor to our Veterans. The consequences of not being able to collect information via the mail surveys, focus group, and comment card methods are, and not limited to, NCA

not being able to ascertain a timely understanding of the changing needs of its customers to ensure appropriate services and protocols are in place to address pitfalls in our operations and obtaining insight into areas where the NCA excels. The nature of NCA burial and memorial benefits requires a recurring and timely understanding of its customer needs. Without the data provided by these surveys, NCA will not have performance data to report to VA. The reported data is a component of the VA submission of the Annual Performance Plan and Report, which is the VA annual performance review. It is also used to build the budget request. Legally, NCA must meet the requirements of Executive Order 12862, "Improving Customer Service through Effective Performance Management"; not doing this survey as a primary means for understanding and improving upon customer service and utilizing our understanding of it to enhance operational performance would cause NCA to be noncompliant with the Executive Order. Moreover, NCA's customer satisfaction surveys are recurring so that ongoing measures can be created to measure satisfaction and to determine how well the agency meets customer service standards. The burden consists only of that information which is essential to maintain the validity and accomplish the goals of the Executive Order. The results of these information collections have and will continue to lead to improvements in the quality of the NCA service delivery.

7. Explain any special circumstances that would cause an information collection to be conducted more often than quarterly or require respondents to prepare written responses to a collection of information in fewer than 30 days after receipt of it; submit more than an original and two copies of any document; retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years; in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study and require the use of a statistical data classification that has not been reviewed and approved by OMB.

There are no such special circumstances.

8.a. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the sponsor'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 sponsor in responses to these comments. Specifically address comments received on cost and hour burden.

In accordance with 5 CFR 1320.8(d), NCA published a 60-day notice in the Federal Register on May 5, 2023 (Volume 88, Number 87, Page 29180). NCA received no comments in response to this notice.

NCA published a 30-day notice in the Federal Register on July 7, 2023 (Volume 88, Number 129, Page 43420). NCA received one comment in response to this notice that did not relate to the collection.

8.b. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, clarity of instructions and recordkeeping, disclosure or reporting format, and on the data elements to be recorded, disclosed or reported. Explain any circumstances which preclude consultation every three years with representatives of those from whom information is to be obtained.

Outside consultation is conducted with the public through the 60- and 30-day Federal Register notices.

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

There are no plans to provide payments or gifts to respondents. However, participants in focus groups may be reimbursed for travel expenses.

10. Describe any assurance of privacy provided to the extent permitted by law, to respondents and the basis for the assurance in statute, regulation, or agency policy.

The identities of individuals and organizations contacted are carefully protected. Names and personal identifiers are used to locate survey participants and are thereafter stripped from any files kept for analysis purposes. The participants in the sample are all assigned a survey ID, which is used in place of their personal identifiable information to preserve the integrity of the data responses and to facilitate NCA's ability to follow up with participants who request additional VA benefit information or follow up on a NCA benefit in the comment sections of their survey.

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; include 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.

12. Estimate of the hour burden of the collection of information:

Each collection of information consists of the minimum amount of information necessary to determine customer needs and determine how well NCA meets those needs. The burden hour information that follows is based upon not significantly changing protocols from 2020-2022.

Focus Groups. NCA conducts 15 focus groups annually involving a total of 450 hours annually during the approval period.

Mail Surveys. NCA conducts its National Cemeteries Satisfaction and State or Tribal

Veterans Cemeteries Satisfaction surveys to next of kin/family members and funeral directors by mail with a total annual burden of approximately 24,000 hours. NCA also conducts mail surveys of next of kin/family members that receive headstones or markers at private cemeteries and Presidential Memorial Certificates, as well as their associated funeral directors, at an annual burden of 1,500 hours.

Comment Cards. NCA anticipates distributing Comment Cards with a total annual burden of 208 hours.

All individual surveys or ICs include a Paperwork Reduction Act (PRA) statement and burden estimates. When conducting focus groups, the focus group moderator clearly provides this information to all participants.

I. National Cemetery Administration Focus Groups

National Cemetery Administration Focus Groups with Next of Kin
(5 groups/10 participants per group/3 hours each session)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2023	50	150 hours	5 Groups Annually
2024	50	150 hours	5 Groups Annually
2025	50	150 hours	5 Groups Annually

National Cemetery Administration Focus Groups with Funeral Directors
(5 groups/10 participants per group/3 hours each session).

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2023	50	150 hours	5 Groups Annually
2024	50	150 hours	5 Groups Annually
2025	50	150 hours	5 Groups Annually

National Cemetery Administration Focus Groups with Veterans Service Organizations (5 groups/10 participants per group/3 hours each session).

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency</u>
2023	50	150 hours	5 Groups Annually
2024	50	150 hours	5 Groups Annually
2025	50	150 hours	5 Groups Annually

II. National Cemetery Administration Visitor Comment Cards (Local Use)

National Cemetery Administration Visitor Comment Cards
(2,500 respondents/5 minutes per card)

Frequency of

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Response</u>
2023	2,500	208 hours	Annually
2024	2,500	208 hours	Annually
2025	2,500	208 hours	Annually

III. National Cemetery Administration Mail Surveys

National Cemeteries Next of Kin/Family Member Satisfaction Survey
(Mail, 25,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2023	25,000	12,500 hours	Annually
2024	25,000	12,500 hours	Annually
2025	25,000	12,500 hours	Annually

National Cemeteries Funeral Director Satisfaction Survey
(Mail, 4,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2023	4,000	2,000	Annually
2024	4,000	2,000	Annually
2025	4,000	2,000	Annually

State or Tribal Veterans Cemeteries Next of Kin/Family Member Satisfaction Survey
(Mail, 15,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2023	15,000	7,500 hours	Annually
2024	15,000	7,500 hours	Annually
2025	15,000	7,500 hours	Annually

State or Tribal Veterans Cemeteries Funeral Director Satisfaction Survey
(Mail, 4,000 respondents/30 minutes per survey)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2023	4,000	2,000	Annually
2024	4,000	2,000	Annually
2025	4,000	2,000	Annually

IV. Program/Specialized Service Survey

VA Memorial Products Survey (Next of Kin and Funeral Directors)
(Mail, 6,000 surveys 15 minutes each)

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2023	6,000	1,500 hours	Annually
2024	6,000	1,500 hours	Annually
2025	6,000	1,500 hours	Annually

V. Total Burden Hours Per Year

<u>Year</u>	<u>Total Number of Respondents (all surveys)</u>	<u>Estimated Annual Burden</u>
2023	56,650	26,158
2024	56,650	26,158
2025	56,650	26,158

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

There is no cost to the respondent to complete the survey.

14. Provide estimates of annual cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operation expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The estimated annual costs for these mail surveys, focus groups, and comment cards including contract support, travel costs, and other direct costs is approximately \$621,000 in 2023. In addition to recurring survey work, additional efforts to enhance and redesign surveys, sampling plans, and survey administration protocols will be conducted in phases over the course of the next five years (2023 – 2027).

NCA CUSTOMER SATISFACTION SURVEY CONTRACT COSTS BY CONTRACT YEAR	
Year	Amount
2023	\$620,864.28
2024	\$713,993.92
2025	\$821,093.01
2026	\$944,256.96
2027	\$1,085,895.51

15. Explain the reason for any burden hour changes or adjustments reported in items 13 or 14.

NCA conducts its annual customer satisfaction surveys leveraging a contract that is closely managed by the NCA Performance Analysis and Planning Service. Though NCA sets some preliminary requirements, NCA depends on the expertise of the vendor to guide all aspects of the survey design, analysis, and reporting. The initial burden hours estimate reported in the OMB Clearance submitted in 2016 was informed by the vendor NCA used in 2015. In subsequent iterations of the survey, the methodology has been fairly consistent. For the upcoming survey cycle, NCA will not implement significant changes to its surveys or survey administration protocol.

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.

To provide the timeliest actionable data for NCA executive leadership, NCA begins sending out surveys August of the prior year through May of the following year. Data files are reviewed and cleaned to reduce duplication of surveys being resent to next of kin/family members each quarter. The survey fielding wraps up in July and data analysis commences with final reports being made available in August and September. The results obtained from these information collections are disseminated to management officials, VA employees, and the public. NCA leadership teams gets the data rolled up at the national level, district level, and cemetery level. NCA publishes the data outside of NCA at the national level rollup of findings, this includes the publicly available data.

17. If seeking approval to omit the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Survey instruments do not display an expiration date and if required to do so, would result in unnecessary waste of the existing stock. For this reason, VA continues to seek an exemption that waives the displaying of the expiration date.

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

There are no exceptions.