

**1SUPPORTING STATEMENT A
FOR PAPERWORK REDUCTION ACT SUBMISSION**

**Technical Evaluation Surveys
OMB Control Number 1029-0114**

Terms of Clearance: None

Justification

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

The Office of Surface Mining Reclamation and Enforcement (OSM) collects information through four customer service survey forms to assess whether its technical assistance, technology transfer activities, meetings, and technical forums effectively meet the needs of participants and recipients. Respondents include representatives of State and Tribal regulatory and reclamation authorities, industry, environmental organizations, and citizen groups who receive technical assistance or participate in OSM-sponsored activities.

These customer service survey forms are the primary mechanism by which OSM obtains qualitative feedback needed to evaluate progress toward performance goals established in its annual performance plans prepared in accordance with the Government Performance and Results Act (GPRA, Pub. L. 103-62). Customer satisfaction is recognized as an important performance indicator across Federal agencies, and the surveys enable OSM to measure satisfaction, identify strengths, and target areas for improvement in its service delivery.

The collection is subject to the Paperwork Reduction Act (44 U.S.C. 3501 et seq.), which requires Office of Management and Budget (OMB) approval for information collections from the public. While the PRA itself does not mandate the collection, it governs and authorizes OMB's review and approval of the information collection.

The information collected supports OSM's responsibilities under the **Surface Mining Control and Reclamation Act of 1977 (SMCRA, Pub. L. 95-87; 30 U.S.C. §§ 1201 et seq., particularly Title IV, §§ 1231-1244)** by helping ensure that technical assistance, technology transfer, and outreach activities conducted in support of State and Tribal mining and reclamation programs are effective and responsive to stakeholder needs. Collecting feedback from participants enables OSM to improve the quality and effectiveness of its services and to perform its oversight, coordination, and technical assistance functions in a manner consistent with its statutory mission.

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. Be specific. If this collection is a

form or a questionnaire, every question needs to be justified.

OSM is seeking renewed approval for the use of four customer service survey forms designed to evaluate the following areas:

- 1. Technical Assistance Evaluation**
- 2. Technology Transfer Evaluation**
- 3. Meeting/Forum Evaluation**
- 4. Applicant/Violator System (AVS) Services Evaluation Form (online survey through SurveyMonkey)**

These survey results support OSM's responsibilities under SMCRA by improving the technical assistance and technology transfer activities that help State and Tribal programs administer reclamation and regulatory responsibilities. The information is also used to evaluate program performance under the Government Performance and Results Act (GPRA), including customer satisfaction indicators. Historically, OSM has used data from these surveys to refine technical assistance approaches, update training materials, adjust technology transfer priorities, and improve the content and structure of meetings and forums.

Before distributing the forms, OSM employees must enter their office name and contact information on the form to ensure respondents know which OSM office facilitated the activity.

Justification for Survey Questions

Each survey contains standard customer service evaluation questions addressing clarity of information, usefulness of assistance, timeliness of service, staff knowledge, professionalism, and overall satisfaction. These question categories are necessary to assess the specific service provided and identify areas where improvements may be needed to better support State, Tribal, industry, and public stakeholders. Open-ended comment fields are included to allow respondents to provide context, examples, and additional details that can yield actionable insights for program improvement.

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 and specifically how this collection meets GPEA requirements.

OSM uses electronic methods to minimize respondent burden and comply with the **Government Paperwork Elimination Act (GPEA)**. The **Applicant/Violator System (AVS) Evaluation Form** is sent to customers who receive services through the AVS office. This form is sent via email and customized based on the service received.

The **Technical Assistance, Technology Transfer, and Meeting/Forum Evaluation Forms** are available on OSM's website at: <https://www.osmre.gov/resources/forms>.

Respondents may complete and submit these forms electronically. Based on historical data, OSM estimates that approximately **95% of survey responses are submitted electronically**, significantly reducing the burden compared to paper submissions.

By providing electronic access and submission options, OSM ensures compliance with GPEA requirements and promotes efficiency in collecting and analyzing customer feedback.

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.

There is no duplication. The requested information is site- and activity-specific and is not otherwise available within the agency.

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

This information collection does not have a significant impact on small businesses or other small entities. Participation in the customer service surveys is voluntary and follows involvement in OSM technical assistance activities, technology transfer events, or meetings/forums. No small entities are required to participate, and no special methods are needed to minimize burden.

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.

If this information is not collected, OSM would be unable to evaluate or improve the effectiveness, quality, and usefulness of its technical assistance, technology transfer activities, and meetings/forums. The surveys provide essential feedback that helps OSM assess whether services are meeting stakeholder needs, identify areas for improvement, and ensure that technical activities support State and Tribal programs effectively.

Without this information, OSM would also be unable to measure customer satisfaction or demonstrate progress toward performance goals under the Government Performance and Results Act (GPRA). Collecting the information less frequently would limit OSM's ability to make timely improvements in program delivery and reduce the effectiveness of its technical outreach. There are no technical or legal obstacles to reducing burden beyond the existing voluntary, electronic submission process.

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

- * requiring respondents to report information to the agency more often than quarterly;**
- * requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- * requiring respondents to submit more than an original and two copies of any document;**
- * requiring respondents to 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;**
- * requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- * 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; or**
- * requiring respondents to submit proprietary trade secrets, 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.**

This information collection does not involve any special circumstances. Participation in these surveys is voluntary, and the guidelines in 5 CFR 1320.5(d)(2) are not exceeded.

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 in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

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.

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

Federal Register Notice & Public Comments

On June 22, 2026, OSM published the required 60-day notice in the Federal Register (91 FR 37139) soliciting comments from the public on this information collection prior to submission to OMB. The public comment period closed on August 21, 2026.

No public comments were received in response to this notice.

No comments have been received regarding the PRA statement associated with this collection over the past three years.

External Consultations

In 2026, OSM conducted outreach and consulted with representatives of State Regulatory Authorities to obtain their views on data availability, collection frequency, instruction clarity, and reporting formats. Feedback from respondents in 2026 was largely unchanged from survey responses received in 2020 and 2022.

Direct contacts were made with the following organizations:

Indiana Abandoned Mine Land Program
Department of Natural Resources - Division of Reclamation

Illinois Department of Natural Resources
Office of Mines and Minerals - Abandoned Mine Lands

Summary of Feedback & Agency Response

- Data Availability and Instruction Clarity: Participants did not identify any concerns regarding the availability of data, frequency of collection, clarity of instructions, or recordkeeping requirements.
- Cost and Hour Burden Feedback: Respondents specifically indicated that the information collection requirements do not impose an undue cost or hour burden.
- Specific Observations & Actions: Some respondents did not consider the ongoing survey requirement burdensome. Additionally, some respondents flagged that the administrative process is most noticeable when the survey timeline overlaps directly with their annual grant application processes. OSM intends to continue monitoring scheduling coordination to minimize administrative overlap for state partners where feasible.

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

No payments or gifts will be provided to respondents.

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

No confidential information is solicited, and no assurance of confidentiality is provided.

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. 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.

Sensitive questions are not asked in this information collection.

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

- * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. 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 desirable. 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.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- * Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.**

Estimated Information Collection Burden

12(a). Burden Hour Estimates for Respondents

In 2025, respondents returned **366** surveys. **Technical Assistance, Technical Transfer, and Meeting/Forum Evaluation** surveys require an estimated **5 minutes** to complete, and **AVS Technical Assistance** surveys require about 2 minutes.

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Survey Name	Number of Responses	Minutes Needed per Response	Total Minutes Annually	Total Hours Annually
Technical Assistance	98	5	490	8.17
Technical Transfer	222	5	1110	18.50
Meeting/Forum Evaluation	0	5	0	0
AVS Technical Assistance	46	2	92	1.53
<i>Total</i>	366		1692	28.20

A total of **366 responses × 2 to 5 minutes** results in **1,692 minutes**, or **28 hours**, of annual respondent burden. No special surveys were conducted to derive these estimates; burden times reflect staff experience and typical completion times for comparable customer service surveys.

Special Note: No Meeting/Forum Evaluation surveys were sent or received during this reporting period; therefore, the actual number of responses for this information collection is 366, as shown in both Supporting Statement A and Supporting Statement B. However, because ROCIS requires each active IC activity to report at least one annual response, OSM will enter 1 response and 0 burden hours for the Meeting/Forum Evaluation survey in ROCIS. This results in a ROCIS total of 367 responses, while the Supporting Statements correctly reflect the true operational total of 366 responses. The burden estimates in this Supporting Statement are based solely on the actual activity level of the collection.

Historical Response Rates: Based on historical data from 2008–2026, the weighted average response rate across all four survey instruments is approximately **70 percent**, demonstrating consistent participation and supporting the continued use of a census approach.

12(b). Estimated Cost to Respondents

To account for employee benefits, OSM applies a government-sector benefits multiplier of **1.63**, based on Bureau of Labor *Statistics Employer Costs for Employee*, published June 12, 2026 *Compensation* data (<https://www.bls.gov/news.release/ecec.nr0.htm>).

OSM used the occupational category **Environmental Engineers** (SOC 17-2081) as the closest available match to the technical duties of survey respondents. According to the Bureau of Labor Statistics Occupational Employment and Wage Statistics (May 2025), the median hourly wage for Environmental Engineers is **\$50.28** (<https://data.bls.gov/oes/#/industry/999200/2025>).

Applying the benefits multiplier:

$\$50.28 \times 1.63 = \textbf{\$81.96 per hour}$ (fully loaded rate)

Table 12(b) – Estimated Annual Respondent Labor Cost

Respondent / Position	SOC Code	Annual Burden Hours	Base Hourly Wage	Benefits Factor	Fully Loaded Hourly Rate	Annual Labor Cost
Environmental Engineers (State Employees)	17-2081	28	50.28	1.63	81.96	\$2,295
Total		28				\$2,295

The estimated annual labor cost to respondents is **\$2,295**, calculated using the fully loaded hourly wage rate. This estimate excludes costs for contracting, equipment, or other non-labor expenses, consistent with OMB instructions.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- * The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation, maintenance, and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). 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. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
- * If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize

the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the Government, or (4) as part of customary and usual business or private practices.

Total Annual Non-Wage Cost Burden to Respondents: \$0

a. Annualized Capital and Start-Up Costs

There are **no capital or start-up costs** associated with this information collection. Respondents are not required to purchase equipment, software, record storage facilities, or other capital resources specifically to complete or submit the Technical Evaluation Survey. Therefore, the estimated annualized capital and start-up cost burden is **\$0**.

b. Operation and Maintenance Costs

There are no operation, maintenance, or purchase-of-services costs associated with this information collection. Respondents are not required to pay filing fees, purchase services, maintain specialized equipment or systems, or incur other non-hour expenses specifically to complete or submit the Technical Evaluation Survey. Therefore, the estimated annual operation, maintenance, and purchase-of-services cost burden is **\$0**.

Accordingly, the total annual non-hour cost burden to respondents is **\$0**.

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 not have been incurred without this collection of information.

Estimate of Annualized Cost to the Federal Government

The total estimated annualized cost to the Federal Government for this information collection is **\$7,320**. This cost consists of Federal staff time required to review completed Technical Evaluation Surveys. OSM estimates that there are no additional contractor, specialized equipment, printing, or dedicated support staff costs attributable to this information collection. Employee benefits and associated personnel costs are incorporated into the fully loaded hourly labor rate described below.

Methodology and Cost Calculation

OSM estimates that it receives **366 completed surveys annually**. Each survey requires an average of **15 minutes (0.25 hours)** of Federal staff review. Accordingly, the annual Federal review burden is:

$366 \text{ surveys} \times 0.25 \text{ hour per survey} = \mathbf{91.50 \text{ hours annually}}$

Survey reviews are conducted by a Program Analyst at the **GS-13, Step 5** level. According to the **2026 OPM Salary Table (RUS locality pay area)**, the applicable hourly wage rate is **\$49.38** (effective January 2026):

https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2026/RUS_h.pdf

To account for employee benefits, OSM applies a government-sector benefits multiplier of **1.63**, based on Bureau of Labor Statistics *Employer Costs for Employee Compensation*, published **June 12, 2026**:

<https://www.bls.gov/news.release/ecec.nr0.htm>

The fully loaded hourly labor rate is therefore:

$\mathbf{\$49.38 \times 1.63 = \$80.51 \text{ per hour (rounded)}}$

Using this fully loaded rate, the estimated annualized Federal cost is:

$\mathbf{91.50 \text{ hours} \times \$80.51 = \$7,367}$

Thus, the total estimated annualized cost to the Federal Government for administering this information collection is **\$7,367**

Summary of Estimated Annual Federal Government Cost

Federal Review Activity	Number of Surveys Reviewed	Average Hours per Review	Total Annual Hours	Hourly Wage	Benefits Multiplier	Loaded Hourly Rate	Annual Federal Cost
Review of Technical Evaluation Surveys	366	.25	91.5	49.38	1.63	\$80.51	\$7,366.67
Total (Whole Number)			92				\$7,367

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

The currently approved annual burden is 17 hours. Based on updated response data, annual responses increased from 203 to 366, resulting in a recalculated burden of 28 hours (see Item 12). This increase of 11 hours represents an adjustment due to updated respondent activity and does not reflect a program change.

	Annual Burden Hours
Currently approved	17
Adjustment	<u>+ 11</u>
Hours requested	28

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.

OSM does not publish the results or tabulations of this information collection. The survey responses are analyzed internally for program management and training evaluation. Simple descriptive statistics (averages and percentages) are compiled continuously following training sessions to assess course quality. There are no plans for public dissemination or formal publication.

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.

OSM is not seeking approval to omit the display of the OMB control number or expiration date. The expiration date will be displayed on all survey instruments in accordance with the Paperwork Reduction Act requirements.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exception is requested.