

**Supporting Statement for
Generic Clearance for the National Cemetery Administration
Customer Satisfaction Surveys
(2900-0571)**

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) will conduct surveys to determine the level of satisfaction with existing services among their customers. The surveys will 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 actually 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.

The National Cemetery Administration 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 will continue 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 plans to continue to use the information

gathered to determine what services are satisfactory and meet customer needs and expectations. Additionally, NCA will gain insight into areas for improvement. 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 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 plans to survey 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, through the use of mail surveys, focus groups, and comment cards. Participation in the surveys is voluntary and the generic clearance will not be used to collect information required to obtain or maintain eligibility for a VA program or benefit. Voluntary customer surveys are not program evaluations and will not be used as substitutes for traditional program evaluation surveys that measure objective outcomes. In order to maximize the voluntary response rates, the information collection will be designed to make participation convenient, simple, and free of unnecessary barriers.

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 once approved by OMB, this generic ICR becomes a generic clearance that remains in place for the PRA's maximum approval period of three years. Individual surveys will be 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 will contain questions similar to those that might be asked in the customer satisfaction surveys included in this initial Generic ICR package. Again, prior to use, each individual survey or IC will require a separate submission to OMB (through the generic IRC 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 will be 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 URL utilizing a unique ID assigned to them. The online URL is provided on the paper survey participants receive in the mail. Since offering the online URL option for responding to surveys, NCA has found that the majority of 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.

Nonetheless, NCA has executed a new contract for its Customer Satisfaction Surveys in FY 2020 with a new vendor as of January 30, 2020. The new vendor's tasks include improvements to survey design, sampling plan, and survey administration protocol. Given the prioritization of workload priorities and the need to have 2020 survey data results available to inform NCA planning, budgeting, and operations, NCA is requesting an extension of OMB clearance set to expire June 2020 for its 2020 Customer Satisfaction Surveys administration period. This extension will enable NCA to continue use of preexisting, approved OMB surveys for the 2020 survey cycle. NCA will not make any significant change to them. Instead, NCA will resubmit for OMB clearance for 2021 surveys and beyond once the newly onboarded vendor has had time to improve survey design, sampling plan and survey administration protocol. Also planned for the 2021 surveys and beyond are additional survey question changes being requested by NCA executive leadership team to expand NCA's understanding of other aspects of the customer's experience with 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 will use 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 a URL with a unique identifier to respond to the survey electronically. Moreover, NCA has plans to redesign the funeral director survey, sampling plan, and administration protocol to

further minimize the burden on these key stakeholders. More information will be available in the OMB clearance NCA Plans to submit in FY 2021 once NCA's new vendor has completed redesign efforts.

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 has to 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 special circumstances that require the collection of information to be conducted in a manner that is inconsistent with the guidelines in 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 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.

The agency notice was published in the Federal Register on Friday, February 28, 2020, Volume 85, No. 40, pages no. 12064-12065. The notice solicited comments relating to the organizations' customer satisfaction survey proposals. No public comments were received.

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 will be carefully protected. Names and personal identifiers will be used to locate survey participants and will thereafter be 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 in order 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.

Questions of a sensitive nature will not be asked.

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

Each collection of information will consist 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 the 2016-2019 efforts. A 2021 OMB clearance request will be submitted once new protocols are developed and ready for fielding.

Focus Groups. NCA expects to conduct 15 focus groups annually involving a total of

450 hours annually during the approval period.

Mail Surveys. NCA expects to conduct 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 plans to conduct 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 will include a Paperwork Reduction Act (PRA) statement and burden estimates. When conducting focus groups, the focus group moderator will clearly provide 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>
2020	50	150 hours	5 Groups Annually
2021	50	150 hours	5 Groups Annually
2022	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>
2020	50	150 hours	5 Groups Annually
2021	50	150 hours	5 Groups Annually
2022	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>
2020	50	150 hours	5 Groups Annually
2021	50	150 hours	5 Groups Annually
2022	50	150 hours	5 Groups Annually

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

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

<u>Year</u>	<u>Number of Respondents</u>	<u>Estimated Annual Burden</u>	<u>Frequency of Response</u>
2020	2,500	208 hours	Annually
2021	2,500	208 hours	Annually
2022	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>
2020	15,000	7,500 hours	Annually
2021	25,000	12,500 hours	Annually
2022	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>
2020	4,000	2,000	Annually
2021	4,000	2,000	Annually
2022	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>
2020	15,000	7,500 hours	Annually
2021	15,000	7,500 hours	Annually
2022	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>
2020	4,000	2,000	Annually
2021	4,000	2,000	Annually
2022	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>
2020	6,000	1,500 hours	Annually
2021	6,000	1,500 hours	Annually
2022	6,000	1,500 hours	Annually

V. Total Burden Hours Per Year

<u>Year</u>	<u>Total Number of Respondents</u> (all surveys)	<u>Estimated Annual Burden</u>
2020	51,650	23,658
2021	56,650	26,158
2022	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

\$600,000.00. 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 (2020 – 2024). NCA is contracting with another federal agency as its vendor to complete using an Interagency Agreement (IAA) executed effective January 30, 2020. Below is a table breaking out the costs over the life of the IAA. The vendor’s costs include quantification of hours, operation expenses, overhead, printing, and support staff.

NCA CUSTOMER SATISFACTION SURVEY CONTRACT COSTS BY CONTRACT YEAR, COST AND COST TYPE									
Year	Base Tasks	Base Task Overhead	Total Base Tasks (includes overhead)	Optional Tasks	Optional Tasks Overhead	Total Optional Tasks (includes overhead)	Total Before Overhead Applied	Total Overhead	Grand Total (includes overhead)
2020	\$476,746	\$65,011	\$541,757	\$56,461	\$7,699	\$64,160	\$533,207	\$72,710	\$605,917
2021	\$493,910	\$67,351	\$561,261	\$44,651	\$6,089	\$50,740	\$538,561	\$73,440	\$612,001
2022	\$446,366	\$60,868	\$507,234	\$82,870	\$11,300	\$94,170	\$529,236	\$72,168	\$601,404
2023	\$459,757	\$62,694	\$522,451	\$56,382	\$7,688	\$64,070	\$516,138	\$70,383	\$586,521
2024	\$517,550	\$70,575	\$588,125	0	0	0	\$517,550	\$70,575	\$588,125
Total	\$2,394,329	\$326,499	\$2,720,828	\$240,363	\$32,777	\$273,140	\$2,634,692	\$359,276	\$2,993,968

15. Explain the reason for any program changes or adjustments reported in Items 13 or 14 of OMB 83-I

NCA conducts its annual customer satisfaction surveys leveraging a contract that is closely managed by his Policy and Planning Service line. 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 2016 NCA changed vendors during the execution period because the incumbent vendor was not meeting requirements of the contract. Consequently, NCA awarded its annual customer satisfaction survey contract to a new vendor. That vendor utilized a different survey sampling methodology that resulted in an increase in the sample size and utilized other protocols that increased respondents. As a result, the actual respondents to the NCA Customer Satisfaction Survey increased significantly in the National Cemeteries Next of Kin survey from 2016 to 2019. In 2020, NCA awarded its customer satisfaction survey to a new vendor.

To increase standardization in methodologies for survey sampling and administration, NCA has hired a PhD level statistician to help develop technical assistance guidelines and protocols. NCA will reflect the relevant changes to burden hours in its 2021 OMB clearance submission once the survey redesigns, sampling plans, and survey administration protocols have been developed. For 2020 survey cycle, NCA will not implement significant changes to its surveys or survey administration protocol.

NCA provides updated burden hours based upon the changes to the sampling plan from the single vendor contracted to do the NCA customer satisfaction survey between 2016 - 2019. The survey sample size doubled for all surveys except the funeral director survey. Despite this, the respondents to the survey (response rate) has held steady for all surveys except for the National Cemeteries Next of Kin/Family Member Satisfaction Survey. The total respondents will increase from 15,000 to 25,000, increasing burden hours from 7,500 to 12,500.

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 Aug of the prior year through May of the following year. Generally, surveys are sent out quarterly 90 days following interments that occurred in the prior quarter. 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 to the "Certification of Paperwork Reduction Act Submission."