SUPPORTING STATEMENT APPLICATION FOR TRAINING OMB #0920-0017

Revised 11/09/2006

A. Justification. This request is for approval of a revision of a currently approved collection:

National Laboratory Training Network Registration Form- CDC 32.1 (paper form) (Attachment 1)

National Laboratory Training Network Registration Form - CDC 32.1 (electronic form) (Attachment 2)

CDC Training and Continuing Education New Participant Registration Form - CDC 36.5 (electronic form) (Attachment 3)

1. Circumstances of Information Collection.

The Centers for Disease Control and Prevention (CDC) through its Office of Workforce and Career Development (OWCD) and other Centers, Institutes, and Offices offers training activities on public health topics to professionals worldwide. Employees of hospitals, universities, medical centers, laboratories, state and federal agencies, and state and local health departments apply for training in an effort to learn up-to-date public health practices. CDC's training activities include laboratory training, classroom study, online training, and distance learning activities. The "National Laboratory Training Network Registration Form" (paper and electronic forms) and the "CDC Training and Continuing Education New Participant Registration Form" (electronic form)" are official application forms used for training activities conducted by CDC. CDC form 32.1, "National Laboratory Training Network Registration Form", is used for all laboratory field training. The "CDC Training and Continuing Education New Participant Registration Form" is completed by health practitioners seeking to register for training available through the CDC's online registration system. CDC was granted OMB approval to use these forms through December 31, 2006.

These application forms provide CDC with information necessary to manage and conduct training activities pertinent to its agency mission (Public Health Service Act, http://energycommerce.house.gov/108/pubs/109 health.pdf) (Attachment 4). The information collected in these forms allows CDC to send confirmation of registration to participants, provide certificates of attendance or continuing education credits as proof of their attendance, and generate management reports used to identify training needs, design courses, select location for courses, and evaluate programs.

CDC is accredited by (1) the International Association for Continuing Education and Training (IACET) to provide Continuing Education Units (CEUs), (2) the Accreditation Council for Continuing Medical Education (ACCME) to provide Continuing Medical Education credits (CME), (3) the American Nurses Credentialing Center (ANCC) to provide Continuing Nurse

Education credits (CNE), (4) the National Commission for Health Education Credentialing (NCHEC) to award CHES credit, (5) the Accreditation Council for Pharmacy Education (ACPE) to provide continuing pharmacy credit, and (6) the American Association of Veterinary State Boards to award Registry of Approved Continuing Education (RACE) credit. The accrediting organizations require a method of tracking an individual completing an educational activity and demographic data allows us to do so. Also, many of the organizations require a permanent record which lists the participant's name, address, and phone number to retrieve historical information as to when a particular individual completed a course or several courses over a time period. This information provides the basis for producing a requested transcript or determining if a person is enrolled in more than one course. The email address is used to verify the participant's electronic request for transcripts and course certificates.

2. Purpose and Use of Information.

The information requested on the forms is used by the Centers for Disease Control (CDC), Office of Workforce and Career Development (OWCD) and the Association of Public Health Laboratories (APHL) which has a cooperative agreement to support the National Laboratory Training Network (NLTN) to grant public health professionals the continuing education credits they need to maintain their licenses and certification required by their profession. This information is also needed to create a transcript or summary of training completed at the participant's request. In addition, the forms are also needed to generate management reports and to maintain training statistics. These reports have assisted CDC in the past three years and will continue to assist CDC in the management of its training programs, such as, identifying training needs, designing courses, selecting locations for courses, and evaluating programs. The forms are electronic and hardcopy.

3. Use of Improved Information Technology.

The information collected on the forms is the minimum necessary to process and evaluate each application.

The "National Laboratory Training Network Registration Form" has been revised since the last submission for clearance (March 2003). **The proposed form has eliminated the signature and date line, added three employer codes and combined four hospital codes into one code.** Explanation: Elimination of the signature and date line was due to on line registration. The three added employer codes (agriculture laboratory, veterinary laboratory, and environmental laboratory) were added to the Type of Employer due to recent ability of CDC to award veterinary and pharmacy credits for continuing education programs/activities. The definement of hospitals (city-county funded, state funded, or private community) is no longer needed.

The information requested (options on the Netform internet site) on the electronic registration form for the "National Laboratory Training Network Registration Form" will be identical to the paper registration form. **The screens of the electronic form are found in Attachment 2**. Once the initial identifying data is captured into a database, it is then used for analysis and processing of students. If a hardcopy application form is used, the forms are shredded after transcribing of data into a password and firewall protected file.

The "CDC Training and Continuing Education New Participant Registration Form" requires no changes from the previously approved form. This form is only available via the Internet. The first screen of each electronic form is found in Attachment 3.

4. Efforts to Identify Duplication.

The basic name and address information is not readily accessible or available from any other source. CDC's applications are used for uniformity and standardization that are required for tracking attendance in the course offerings. The standardized data that is required for the laboratory training, classroom study, online training, and distance learning activities are only provided on these forms. No other CDC component requests this information.

5. Involvement of Small Entities.

Physicians, nurses, health educators, pharmacists, and veterinarians are frequently part of CDC's target audience. The information requested of them is minimal: name, address, phone number, email address and profession. This information is required in order to meet the accrediting organizations standards and to distinguish specific professional groups for aggregate reporting purposes.

6. Consequences if Information Collected Less Frequently.

Data is collected only once per course per applicant or once per new registration. There are no legal obstacles to reduce the burden.

7. Special Circumstances.

This request fully complies with the regulation.

8. Consultation Outside the Agency.

- A. A notice was published in the Federal Register: June 30, 2006 (Volume 71, Number 126, Page 37582-37583). (Attachment 5). CDC did not receive any public comments.
- B. Although there were no formal consultations outside the agency, CDC encourages students' comments in the evaluation segment of each program. There have been no problems identified concerning the completion of course applications.

9. Payments to respondents.

There are no payments or gifts to respondents.

10. Assurance of Confidentiality.

The CDC Privacy Act Officer has reviewed the request for OMB approval and has determined that the Privacy Act is applicable. Data will be covered under the Privacy Act record system, 09-20-0161, "Records of Health Professionals in Disease Prevention and Control Training Programs," last published in entirety in the Federal Register, Vol. 51, No. 226, November 24, 1986, pp. 42485-87 and last updated in 1994.

Data on paper forms are safeguarded with forms kept in locked files in locked rooms, with

access limited to those staff with a bona fide need to know in order to perform their official duties. Computerized data is password protected. Data is on a separate, distinct server under strict physical security. Registrant data is not sold, rented or shared with third parties for their promotional use. All data is behind a strict firewall with security protection. Forms are shredded after information has been computerized.

Data collected on the electronic version (36.5) of both forms is stored on a secured Microsoft SQL Server located behind the CDC firewall. Access to information on the CDC Microsoft SQL Server is available only to applicable CDC employees and security provisions for data storage meet all requirements established by CDC's Health Information System and Surveillance Board (HISSB). The Privacy Act statement included on all forms states "furnishing the information requested on the form, is voluntary."

11. Questions of a Sensitive Nature.

There are no questions of a sensitive nature.

12. Estimate of Annualized Burden Hours and Costs.

The only cost to the respondent is the time involved to complete the forms. It is estimated that for both forms together, 40,000 responses are received each year requiring from 3 to 5 minutes each to complete the form, for a total annual respondent burden of 3,332 hours. Approximately 80% of the data will be collected electronically. Each respondent/student completes an online or a hard copy registration form for each activity/program they attend. Either hardcopy or online/electronic response is the same burden.

ESTIMATES OF ANNUALIZED BURDEN

Form	Number of Respondents	Responses per Respondent	Hrs/Response	Response Burden in hours
National Laboratory Training Network Registration Form Training, Form 32.1	20,000	1 (this is a one page form that is required per respondent for an activity)	5/60	1,666
CDC Training and Continuing Education New Participant Registration Form 36.5	20,000	1	5/60	1,666
Total	40,000	2	10/60	3,332

The "20,000" as the number of respondents are different in target groups. The same total with different audiences. Form 32.1 is used by the National Laboratory Training Network either in the electronic or hardcopy format. Form 36.5 is used by CDC for online registration. The respondents/students only complete one form per activity.

Estimates of Annualized Cost to Respondents

Form	Number of Respondents	Responses per Respondent	Average wage rate	Burden
National Laboratory Training Network Registration Form Training, Form 32.1	20,000	1	\$22/hour (\$1.83 per 5 min.)	\$3,048 (\$1.83 X 1666)
CDC Training and Continuing Education New Participant Registration Form 36.5	20,000	1	\$48.02/hr \$4.00 per 5 min	\$6,664 (\$4.00X 1666)
Total	40,000	2	\$70.02	\$9712

Form 32.1 estimates the average 2005 hourly wage rate based on the August 2006, Volume 37 Number 8 of LABMEDICINE. The article is titled ASCP 2005 Wage and Vacancy Survey of Medical Laboratories (Attachment 6).

Form 36.5 estimates the average hourly wage rate based on Allied Physicians –Physician Salaries and Surveys (Attachment 7).

13. Estimates of Annualized Respondent Capital and Maintenance Costs. None.

14. Estimates of Annualized Cost - Government.

It is estimated that the annual cost to the government is \$120,000 (Form 32.1) and \$123,600 (Form 36.5). This includes printing of forms, mailing requested forms, and personnel costs associated with registration and data management.

Form 32.1 personnel registration and data management costs estimates =1 FTE, Health Scientist, 25% of time dedicated to time spent on database (\$20,000); 1 Non-FTE Onsite Contractor, Software Engineer, 25% of time dedicated to project, (\$25,000); 1 Non-FTE, Registrar 50% of time (\$45,000); 1 Non-FTE, Program Manager, 20% of time, (\$15,000).

Form 36.5 Training and CE Online system personnel and data management costs estimates = 1 FTE, Training Specialist, 50% of time dedicated to maintaining, supporting and enhancing the

system (\$ 34,000); 1 Non-FTE Onsite Contractor, General Clerk, 50% of time dedicated to provided learner support to users of the system (\$21,000); 1 Non-FTE Onsite Contractors, Administrative Assistant, 75% of time dedicated to maintaining the system and providing learner support to users of the system (\$33,600), and 1 Non-FTE Onsite Contractors, Software Engineer, 25% of time dedicated to provided technical support and enhancing system (\$25,000).

15. Changes in Hour Burden.

The burden hours have changed due to a decrease in the number of respondents.

The decrease is a combination of fewer respondents and more streamed line electronic forms a

decrease in the amount of minutes from 8 minutes to 5 minutes to complete the forms. Also, a loss of respondents/students is due to a slight decrease in course offerings.

16. Time Schedule, Publication, and Analysis Plans.

Internal reports are prepared annually to provide management statistics. Only summary data are included in these reports. No information is published. The revisions to CDC Form 32.1, "National Laboratory Training Network Registration Form," are an example of how the data is used. The revised form has eliminated the signature and date fields, added three types of employer codes, combined hospital employer codes, and added the e-mail address needed for confirmation of registration.

17. Expiration Date Display Exemption.

CDC is not requesting an exemption from displaying the expiration date.

18. Exceptions to Certification.

There are no exceptions to certification.

B. Collections of Information Employing Statistical Methods.

The collection of information does not employ statistical methods. The information collected is used for program management and evaluation.

- 1. Respondent Universe and Sampling Methods. The respondent universe consists of employees of hospitals, universities, medical centers, laboratories, state and federal agencies, and state and local health departments who apply for training in an effort to learn up-to-date public health practices. CDC's training activities include laboratory training, classroom study, online training, and distance based learning activities. The information collected in these forms allows CDC to send confirmation of registration to participants, receive certificates of attendance or continuing education credits as proof of their attendance, and generate management reports used to identify training needs, design courses, select location for courses, and evaluate programs.
- **2. Information Collection Procedures.** Respondents complete the form once per course or per new registration. Data from the forms are entered into a tracking database to allow CDC to generate certificates of attendance or continuing education credits as proof of their

attendance or to produce a transcript when requested.

- **3. Methods to Maximize Response Rates and Deal with Nonresponse.** Due to the nature of the forms, they are required to participate in the training classes. Although participation in training classes is voluntary, the forms are a necessary to attend the classes.
- **4. Tests of Procedures or Methods to be Undertaken.** Since this is not a new submission, testing of forms has not been undertaken. Students are encouraged to provide feedback on form usage during the evaluation segment of each training class.

5. CDC Contacts

CDC form 32.1 and 36.5 Judy Delany, M.S., M.P.H.

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Attachments

Attachment 1: National Laboratory Training Network Registration Form- CDC 32.1 (paper form)

Attachment 2: National Laboratory Training Network Registration Form - CDC 32.1 (electronic form)

Attachment 3: CDC Training and Continuing Education New Participant Registration Form - CDC 36.5 (electronic form)

Attachment 4: Public Health Service Act, http://energycommerce.house.gov/108/pubs/109 health.pdf)

Attachment 5: Federal Register: June 30, 2006 (Volume 71, Number 126, Page 37582-37583).

Attachment 6: ASCP 2005 Wage and Vacancy Survey of Medical Laboratories

Attachment 7: Allied Physicians –Physician Salaries and Salary Surveys http://www.allied-physicians.com/salary-surveys/physicians/; http://www.ncehc.org/seekers/seekers.htm; http://www.ncehc.org/seekers.htm