

**Information Collection Request**

**Reinstatement**

**Evaluation of Effectiveness of NIOSH Publications:  
NIOSH Customer Satisfaction Survey – 5-year follow-up**

Supporting Statement Part A

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# Evaluation of Effectiveness of NIOSH Publications

## A. Justification

### A.1 Circumstances Making the Collection of Information Necessary

As mandated in the Occupational Safety and Health Act of 1970 (PL 91-596), the mission of the National Institute for Occupational Safety and Health (NIOSH) is to conduct research and investigations on work-related disease and injury and to disseminate information for preventing identified workplace hazards (Sections 20 (a) (1) and (d), Attachment A1). This dual responsibility recognizes the need to translate research into workplace application if it is to impact worker safety and well-being. Indeed, NIOSH, through its communication efforts, seeks to promote greater awareness of occupational hazards and their control, influence public policy and regulatory action, shape national research priorities, change organizational practices and individual behavior, and ultimately, improve American working life. While the means for packaging and delivering NIOSH generated information varies, the primary communication vehicle is its series of numbered print publications. For the years 2002 through 2007, NIOSH prepared approximately 300 numbered publications for distribution. Reflecting the need to address different issues and target audiences, these publications are catalogued by NIOSH as Policy Documents, Technical Documents, and Educational Documents.

Policy documents support new or revised standards and regulatory actions aimed at assuring safe and healthful workplaces. NIOSH Criteria Documents, Current Intelligence Bulletins, Special Hazard Reviews and Reports to Congress are examples of NIOSH publications expressly designed for this purpose. The main audiences for such documents are governmental policy makers and regulators at the Federal, State and Local levels. Groups having collateral interest in these documents are professionals offering occupational safety and health services to industry, business and trade associations, labor organizations, insurers, and those engaged in academic pursuits.

Technical documents are intended to clarify occupational safety and health issues through scientific means, furnish new data to support policy recommendations, or identify and promote efforts to address research needs. The subject matter for NIOSH technical documents is highly variable. Publications in this category can deal with prescribed sampling and analytical methods for characterizing workplace exposures to certain agents, hazard control technologies, attributes of personal protective equipment, findings from surveillance studies and investigations of workplace risks as related to fatality, injury, and illness. The main audiences for these types of documents are scientific and health professionals in academia, industry, organized labor and insurers. Other interested groups include Federal, State and local authorities responsible for assuring the safety and health of workers.

Educational documents are intended to promote an awareness of workplace health and safety issues, offer guidance to employers on hazard control strategies, educate worker groups who may be at risk, popularize and publicize safer, more healthful work practices. These documents are designed for the general public and written in lay language. They are often used for training

and communication purposes by occupational safety and health professionals to inform workers about job-related health and safety issues. In some instances, an educational document may complement the issuance of a policy document or technical report, the intent being to inform those who may not have the technical background to comprehend a more complex treatment of a given subject. NIOSH educational documents are also quite varied in content and form. Some are published as how-to manuals, illustrating specific steps or control actions in dealing with certain workplace risks. Others may be printed as pamphlets or newsletters to call attention to a specific hazard or describe a proven hazard control technique. The main targets for these documents are those employers and worker groups for whom the subject of the publications has special significance in their work operations. Secondary audiences include OSH professionals, industry/trade associations, and insurers who may serve the employer/workforce groups in question. Policy-makers/regulators may also use these documents in assisting employers on compliance issues.

All of the above kinds of documents are made available to the public through the use of mailing lists of known interested parties, NIOSH eNews, home page announcements on the NIOSH website, promotion at conferences, and other means. In a given year, automatic mailings and responses to new requests for NIOSH publications can exceed 750,000 copies. Yet, these numbers tell little of whether the reports are reaching all of the appropriate audiences, or more importantly, whether the information is perceived as credible and useful by the recipients. Therefore, a baseline survey was conducted in 2003 to assess customer satisfaction

The results from the baseline survey indicated that NIOSH could (1) expand its outreach to the 20% to 25% of professionals who had not used NIOSH materials, (2) produce more publications that provide examples of how to implement and evaluate safety and health improvements, and (3) increase outreach efforts to better serve the occupational health service sectors, such as the occupational nurses and occupational physicians. The results from the NIOSH baseline customer satisfaction survey also served to guide continuing efforts to improve the usefulness, relevance, and quality of NIOSH publications and outreach efforts.

The proposed survey seeks to update the data collected in 2003 and gather data on outreach initiatives NIOSH has undertaken in recent years. This survey is an effort by the agency to obtain current estimates of consumer use/benefit from NIOSH communication products as a whole, as well as to determine the adequacy of the agency's circulation/delivery practices in light of changing distribution approaches and technologies. As will be explained, the survey will be directed to the community of occupational safety and health (OSH) professionals as this audience represents the primary and traditional customer base for NIOSH information materials.

In its statement of strategic goals in conforming to the Government Performance and Results Act (GPRA), and in accordance with the Presidential Memorandum on Improving Customer Service (March 23, 1995, Attachment A2), NIOSH acknowledged its intention to "provide workers, employers, the public, and the occupational safety and health community with information, training, and the capacity to prevent occupational diseases and injuries (Goal #4)." In supporting this goal, the proposed survey will assess how well NIOSH information products are meeting the needs of a major constituency and ways that the publication and distribution process might be

improved.

## Privacy Impact Assessment

The proposed study will involve data collection from 1200 OSH practitioners to understand their use of, access to, and level of satisfaction with NIOSH communications products. In the sections that follow, detail is provided regarding the types of data that will be collected and the methods that will be used. All participants are members of professional associations and are likely to be over 18 years of age. No children under the age of 13 will be involved in the study.

### Overview of the Data Collection System

The proposed customer satisfaction survey will be administered to 1200 individuals who are members of the four OSH professional organizations that partnered with NIOSH for the baseline survey. These organizations are again partnering with NIOSH on this study and will provide access to their membership lists. They are the American Industrial Hygiene Association (AIHA), the American College of Occupational and Environmental Medicine (ACOEM), the American Association of Occupational Health Nurses (AAOHN), and the American Society of Safety Engineers (ASSE). A random sample of 300 individuals from each of these organizations will be selected for participation. A mail survey is planned with an option to allow respondents to complete the survey electronically via a dedicated website.

A computerized tracking system will be developed that will allow tracking of both mail and web survey responses and contact attempts. An initial letter will be sent to each participant alerting them to the survey and giving them the option to complete a web-based version instead. The letter will contain the study URL and provide the participant with a randomly generated access code. If a respondent does not respond to the web version an optical character recognition (OCR) hard copy form will be mailed to the participant. This form allows for scanning of survey responses and matches the e-PDF version of the survey available online. Survey responses received from both mail and online versions will be delivered to NIOSH and not retained by the contractor, Battelle, beyond the contract period. Survey data will be maintained by NIOSH for 5 years following the completion of the study.

### Items of Information to be Collected

The only proposed data collection activity is the NIOSH customer satisfaction survey. This survey will collect general information about the participants' background related to OSH training (e.g., physician, nurse) and type of current employer (e.g., hospital, government agency, etc.), sources for OSH information, opinions about NIOSH and its communication products, preferences and recommendations for such information, and opinions about NIOSH partnerships. The data collection instrument is included in Attachment C1; the instructions included as Attachment C8 will be included in the final printed instrument. No individually identifiable information is being collected in the survey. Battelle will maintain Information in Identifiable Form (IFF), specifically participant Name and Mailing Address, provided by partner associations to develop the sample. This information will not be linked with the survey responses, which will be anonymous and will not include any IFF. The participant database will be stored separately from survey responses and will be maintained by the contractor, Battelle,

until the completion of the study, as noted in Section A.10.

#### Identification of Websites and Website Content Directed at Children Under 13 Years of Age

The Participant Website will comprise a header and series of web pages that are loaded by participants when they login to the website. Participants will be able to review project information, get NIOSH and Battelle contact information, read instructions for completing the interview, read frequently asked questions, and launch the interview. Upon visiting the website, the participant will be prompted to login with their assigned access code. Cookies will not be used; instead, a cookie-less approach will be used for this website. The website will include the following components:

- The Home page will display general information about the study.
- The instructions link will explain how to launch and complete the survey.
- The FAQ page will display the frequently asked questions and answers.
- The Contact Us page will display the contact information for NIOSH and Battelle.
- The Privacy policy of the site, which will remind users that their responses are anonymous.
- The log-in page will launch the survey.
- The logout page will log the user out of the website and thank them for participating.

Access to the participant website limited to CDC, contractor staff directly involved in carrying out the study, and users. There are no websites with content directed at children under 13 years of age. Because the participant website is password protected, the general public, including children, will not have access to the site. Access will be controlled using unique User IDs and passwords. The only page with access to the public (and thus potentially accessible to youth) will be the homepage, which will only contain general information about the study.

The study also provides references to the following NIOSH websites which provide information on items referenced in the questionnaire:

- National Occupational Research Agenda (NORA): <http://www.cdc.gov/niosh/nora>
- Research to Practice (r2p): <http://www.cdc.gov/niosh/r2p>
- WorkLife: <http://www.cdc.gov/niosh/worklife>
- Prevention through Design (PtD): <http://www.cdc.gov/niosh/topics/ptd>

## **A.2 Purpose and Use of the Information Collection**

The purpose of the present survey is to evaluate the effectiveness of the NIOSH communication products program as a whole in serving the broad occupational safety and health professional community by addressing five questions:

- (1) To what extent are NIOSH communication products viewed as credible, useful sources of information on occupational safety and health issues?
- (2) To what extent has NIOSH been successful in distributing its communication products to its primary and traditional audience?

- (3) To what extent, and in what ways, have NIOSH communication products influenced workplace safety and health program policies and practices, or resolved other related issues?
- (4) What improvements could be made in the nature of NIOSH communication products and/or their manner of delivery that could enhance their use and benefits?
- (5) What is the reach and perceived importance of NIOSH outreach initiatives?

A questionnaire addressing the above five questions has been developed (Attachment C1). The survey includes items measuring the familiarity of the target group with NIOSH publications in general, the merits of the subjects covered and manner of treatment, individual respondent experiences and perceived value in using NIOSH information to fulfill workplace safety/health functions or other job needs. Questions dealing with access to NIOSH documents and means for obtaining NIOSH documents are included based on current distribution options. Questions also address preferred delivery modes in light of advances in information technologies. Data are collected on the respondents' training and job responsibilities in an effort to determine how these factors may affect the above reactions. Respondents are also asked to offer suggestions related to content and distribution methods.

A mail survey is planned with an option that will allow respondents to complete the survey electronically. The survey will be implemented through a Task Order contract with Battelle Centers for Public Health Research and Evaluation. As mentioned, the survey will be limited to OSH professionals, and for this purpose four major associations identified with occupational safety and health matters have indicated their willingness to partner with NIOSH in this survey. These are the American Industrial Hygiene Association (AIHA), the American College of Occupational and Environmental Medicine (ACOEM), the American Association of Occupational Health Nurses (AAOHN), and the American Society of Safety Engineers (ASSE). Each association has provided cover letters to the questionnaire for promoting their members response to the project (Attachment C4) and will share their membership lists with NIOSH for drawing a sample of respondents. The total membership for the four associations combined is approximately 57,500. A random sample of 300 will be drawn from each list to provide a total respondent sample of 1200. Based on an 8-person pilot test, it is estimated that the survey form will take an average of 20 minutes to complete.

The 2003 baseline survey established for NIOSH a first benchmark for gauging the effectiveness of its publications and identifying areas for improvement. Based on the findings of the 2003 Survey, NIOSH identified gaps in its outreach to members of the medical-based associations and in the delivering of current information in the form and manner in which practitioners preferred. Specifically, the results of the NIOSH survey revealed a significant gap in our outreach efforts with regard to two of the four professional associations that participated in the study, namely, the American Association of Occupational Health Nurses (AAOHN) and the American Congress of Occupational and Environmental Medicine (ACOEM). While approximately 21% of the overall survey membership indicated that they had not knowingly used a NIOSH service or product, this percentage was higher among AAOHN (34%) and ACOEM (33%) survey participants.

As a result, following the release of the findings from the 2003 Survey, NIOSH in early 2004

initiated a concerted effort to remedy the apparent lack of awareness and usage of NIOSH communication products among the membership of AAOHN and ACOEM. The strategy used to remedy this problem was based on our finding that prior to 2003 communication between NIOSH and the Offices of Communication of AAOHN and ACOEM was largely unsystematic, poorly packaged and promoted. Moreover, NIOSH learned from the 2003 Survey that each association's own newsletter was a primary source of information for their membership. It was clear that NIOSH needed a more proactive way of reaching the members of these two important associations and stakeholders.

This recognition, along with the growing usage of the Internet and e-mail, served as one of the main reasons why NIOSH launched its highly successful *e-News* less than two months after the results of the NIOSH 2003 survey were revealed. The NIOSH *e-News* is a monthly newsletter (<http://www.cdc.gov/niosh/enews/default.html>.) with the purpose of enhancing NIOSH's outreach. Each month, *e-News* reaches more than 24,000 subscribers with information on NIOSH products and services.

The second component of the goal of improving NIOSH's outreach to ACOEM and AAOHN was to encourage their membership to subscribe to the NIOSH newsletter. To accomplish this NIOSH initiated a series of direct mailings to the membership of ACOEM and AAOHN, again providing the membership with an opportunity to subscribe to NIOSH's *eNews* as well as supplying copies of new publications on topics of general interest, such as work-stress and fatigue from long work hours. Meetings also were held with the associations' leadership to address the awareness gap and discuss how their organizations could benefit more from NIOSH's information and services. As a result, each month, e-mail links to *e-News* were sent directly to the editors of the ACOEM and AAOHN newsletters to provide them with information on NIOSH recent events that they could pass along to their readers through their newsletters, along with links to the NIOSH website, and information on how readers could subscribe to the NIOSH *e-News*. Thus, in response to the 2003 survey, NIOSH has established a monthly systematized communication link in the form of NIOSH's *eNews* that flows directly from NIOSH's editorial desks to the desks of the editors of the AAOHN and ACOEM monthly newsletters and publications. As a result of these multiple outreach efforts to AAOHN and ACOEM, the opinion is that NIOSH has gone a long way in addressing any gap in awareness of NIOSH's products and services that was revealed in the 2003 Survey.

NIOSH took an additional step to determine how frequently ACOEM and AAOHN newsletters mentioned NIOSH, its meetings, publications, or recent research findings. Over the course of one year (2005), NIOSH staff monitored copies of newsletters produced by the association for any type of reference to NIOSH or one of NIOSH's publications. The results of this effort indicated that each of the associations' monthly communication newsletters identified NIOSH in nearly every issue with references to a meeting, a publication, or research finding.

The NIOSH website has also been extensively revised based on input and comments from the 2003 survey and as well as based on more recent suggestions from focus groups that consisted of association members from AOHN and ACOEM. Also, as a result of stakeholder feedback beginning with the 2003 survey findings, NIOSH adopted an "industry sector approach," where

the agency's goals of preventing of injuries and illnesses are organized around eight industry sectors. This approach is known as the National Occupational Research Agenda (NORA) II. In response to stakeholder feedback, NIOSH also has undertaken a variety of innovative communication and outreach initiatives, including Research to Practice (r2p), WorkLife, and Prevention through Design (PtD).

In summary, as a result of the 2003 Survey NIOSH instituted several important changes in its distribution and outreach approaches. In this follow-up survey, NIOSH has again partnered with the same four professional associations to re-administer the survey to determine the extent to which NIOSH has been successful in meeting its goals and improving its outreach to these OSH practitioners. This 5-year follow-up survey will enable NIOSH to quantify the success of NIOSH's outreach effort as well as ascertain the current level of customer satisfaction. The survey will also enable NIOSH to identify changes that have occurred in the intervening years as a result of NIOSH's outreach efforts in the form of *e-News*. The investment of resources to organize and publish NIOSH generated information is considerable as is the cost of distributing these materials. Indications that different documents are finding appropriate uses, that the needs for certain subject matter and suitable topic treatments are being met, and that delivery mechanisms are working can offer assurances of reasonable pay-offs at least for a primary target group. Alternatively, indications of deficiencies are also beneficial in providing NIOSH with specific directions for change. Without the type of feedback afforded by this survey NIOSH would have no empirical basis for evaluating the effectiveness of its information dissemination efforts relative to its mission of improving worker safety and health. The survey data will offer a measure of how well NIOSH is meeting its GPRA strategic goal on information dissemination at least for one major audience, namely, OSH professionals.

### Privacy Impact Assessment

No Information in Identifiable Form (IFF) is being collected via the survey. The only IFF that will be required for this project is the contact information for participants provided by the partner associations, which will be retained by the contractor for the sole purpose of distributing the survey and will not be linked to the survey data. The surveys will be anonymous and will not request any IFF.

### **A.3 Use of Improved Information Technology and Burden Reduction**

NIOSH has contracted with Battelle Centers for Public Health Research and Evaluation (Battelle) to collect, manage, and analyze all data for this study. As detailed below, Battelle will use information technology tools to manage the data collection process and reduce the burden of participation by tracking respondent contacts; offering multiple response options, including electronic response; providing a participant website; programming user-friendly questionnaires; and incorporating skip patterns into the questionnaire.

Tracking respondent contacts: A computerized tracking system will be developed specifically for this project for use in monitoring data collection activities. The tracking system will store the dates that the advance letter, initial questionnaire packet, reminder postcard, and follow-up

questionnaire packet were mailed and the dates that completed questionnaires (or refusals) and survey response cards were received. Mailing labels and personalized letters will be generated from this system. The tracking system will be used to generate weekly reports summarizing the status of the data collection activity throughout the data collection period. This system will reduce respondent burden by ensuring that respondents are contacted at appropriate times, and that they are not sent the follow-up mailing if a completed survey response card has been received.

Offering multiple response options: Beginning with the first contact, the personalized advance letter, respondents will be offered the choice of completing the survey on hardcopy or via the web. The personalized advance letters will introduce the survey, alert the participant that paper surveys will be mailed shortly, and provide an opportunity for participants to choose to complete their survey via the web instead. A unique participant password will be included in the letter, along with the study web address (URL). A toll-free phone number will also be included so that the participant may contact study staff in the event that they have any questions or concerns. The second mailing will remind participants that the web option is available, and will again include a unique participant password and the study web address (URL).

Providing a participant website: Battelle will develop a study website to provide participants with easy access to the survey and responses to frequently asked questions. The website will be comprised of a header and series of web pages that are loaded by participants when they login to the website. Participants will be able to review project information, obtain NIOSH and Battelle contact information, read instructions for completing the interview, read frequently asked questions, and launch the interview.

Programming user-friendly questionnaires: The data for the Customer Satisfaction Survey will be collected via machine-readable optical character recognition (OCR) forms (electronic and hardcopy), thereby eliminating the need for any manual data entry and ensuring that respondents are exposed to the survey instruments that are formatted precisely the same way, whether on paper or online. Battelle will design user-friendly, machine-readable optical character recognition (OCR) forms using TeleForm<sup>®</sup>, an automated content capture system that reduces the operating costs associated with manual data entry.

TeleForm<sup>®</sup> provides advanced OCR and throughput capabilities, with accuracy rates approaching 100%. Various types of fields may be added to a form including, for example, constrained print fields (high accuracy character recognition), single-choice fields (bubble), multi-choice fields (mark all that apply), and image zones for unconstrained fields (e.g. other/specify fields). These flexible formatting options facilitate the creation of user-friendly forms that are quick to complete. Response options to all items will be in a format designed to minimize response time and effort.

Battelle will create multi-mode forms using this technology: (a) hardcopy self-administered questionnaires (SAQs) and (b) web e-pdfs with VB scripts that incorporate QA/QC features into the executable pdfs that participants complete online. Participants will fill out and submit the SAQ, either by hand or online according to the participant's individual preference. The hardcopy data will be scanned and combined with the data from the web e-pdfs.

Incorporating skip patterns: In addition to the use of a multi-mode approach and user-friendly forms, the survey is designed to further limit respondent burden by enabling those lacking sufficient familiarity with NIOSH publications to forego answering all but a few anonymous demographic background items on the questionnaire.

#### **A.4 Efforts to Identify Duplication and Use of Similar Information**

The current survey will not duplicate any existing or past NIOSH work. This conclusion was based on a thorough review of internal program activities, literature search, conference and meetings attended that dealt with NIOSH programs, as well as a search of the Internet.

Although not related to the current survey, a search of NIOSH programmatic activities indicated that NIOSH completed a survey in 2005 of manufacturers and users of personal protective devices, namely respirators. The survey was conducted under contract with the U. S. Office of Personnel Management (OPM) to determine how effectively the “NIOSH Personal Protection Technology Laboratory” (NPPTL) was functioning. The survey respondents included both the manufacturers of respirators and the users of respirators, namely fire departments, first responders and safety and health practitioners. [OMB Approved: No. 3206-0236.] OPM processed and analyzed the data and briefed the NPPTL Program on the results. Action plans were developed to address items revealed in the survey results, and to further identify opportunities for improvement in the NPPTL Program.

The review also indicated that NIOSH recently received OMB approval to survey Business and Labor Associations that represent each of the eight NIOSH National Occupational Research Agenda (NORA) industry sectors. [OMB Approved: No. 0920-0544, expired 03/31/2003] The main goals of this survey project, which is slated to start in 2008, were to determine (1) sources of occupational safety and health (OSH) information currently used by the various sector trade associations and labor unions, (2) OSH information presently being disseminated by these trade associations and labor unions to their members, (3) channels of communication within the different sector associations and unions used to disseminate OSH information, and (4) needs for specific types of OSH information, especially those needs not presently being serviced. This is a phone survey to be conducted over three years and has not started as of this time.

The current survey, as indicated, is a follow-up to a baseline survey, which was completed five years ago to assess the level of satisfaction of occupational safety and health (OSH) practitioners with NIOSH’s communication products, namely its publications and information services<sup>1</sup>. Since the vast majority of professional OSH practitioners belong to one of the four primary professional stakeholder associations, ACOEM, AAOHN, AIHA, and ASSE, NIOSH in 2003 partnered with these four professional associations to conduct the customer satisfaction survey.

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<sup>1</sup> <http://www2a.cdc.gov/nioshtic-2/BuildQyr.asp?s1=NIOSH+survey+satisfaction+&f1=%2A&Startyear=&Adv=0&terms=1&D1=10&EndYear=&Limit=10000&sort=&PageNo=1&RecNo=2&View=f&>

The baseline survey was the first to assess the total array of NIOSH publications as circulated to and used by the OSH professional community. Considering the highly influential role of the four target associations in addressing workplace safety and health issues, the current views of members of these associations regarding the merits of NIOSH publications provide critical indicators of the Institute's current performance.

The proposed 5-year follow-up is an essential part of NIOSH's efforts to determine the effectiveness of the programmatic changes that have been implemented since the baseline survey was completed. The results of the follow-up survey will also be incorporated into NIOSH's reporting to OMB on its progress in meeting its goals and mission.

### **A.5 Impact on Small Businesses or Other Small Entities**

The only small businesses which may be impacted by this data collection are any physicians who are members of the four occupational safety and health professional associations. These physicians may be directing occupational safety and health programs in companies, serving as faculty in schools of public health and medicine, or conducting medical management services for employees. These physicians have influential roles and their views toward, and use of, NIOSH publications are critical. Every effort has been made to minimize the burden of the survey on these small entities. First, the survey will be completed only one time. Second, in designing the survey instrument, the number of questions has been held to the minimum necessary for addressing the objectives of the proposed study. Third, the survey has been formatted to facilitate quick response and requires an average of only 20 minutes to complete. Fourth, in instances in which physicians are unfamiliar with NIOSH publications, they need only complete the first few questions and skip to the final two sections of the questionnaire, which should require less than five minutes to complete. Questions on the data collection instrument have been held to the absolute minimum required for the intended use of the data.

### **A.6 Consequences of Collecting the Information Less Frequently**

Respondents are asked to respond to the data collection one time only.

This data collection is a 5-year follow-up assessment of the use and benefits of NIOSH publications. It will provide an assessment of NIOSH's success in implementing recommendations derived from the baseline survey and of the effectiveness of the agency in carrying out its mission of disseminating occupational safety and health information to its primary customer group. A repeat survey at some future date (e.g., 5 years) will measure NIOSH's success in implementing recommendations derived from this follow-up survey.

The consequences to NIOSH of conducting the survey of customer satisfaction less frequently or not at all would be a gradual erosion of NIOSH's capacity to be responsive to the changing needs of the workforce, which ultimately would be reflected in the rate of decline or lack of decline in the number of injuries and illnesses, as reported by the Bureau of Labor Statistics.

This survey is one of the tools that NIOSH uses to ensure that our research products and services

are meeting the needs of practitioners and are relevant to the workplace hazards they find in their occupations. Given the accelerated changes in our economy, our businesses and in the associated workplaces, it is critical that NIOSH maintain its responsiveness to those changes. Surveys of practitioners' needs on a periodic basis, such as every five years, offer one of the few relatively quick methods to determine if the agency's efforts at being responsive, as judged by those who are responsible for implementing NIOSH's recommendations, are indeed effective.

There are no legal obstacles to reduce the burden.

### **A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

This study complies fully with the guidelines of 5 CFR 1320.5. No exceptions to the guidelines are required.

### **A.8 Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

**A. Federal Register Notice.** A 60-day Federal Register Notice was published in the *Federal Register* on March 24, 2008, Vol. 73, No. 57, pp. 15525-15526 (see Attachment B1). Only one response was received (see Attachment B2).

#### **B. Efforts to Consult Outside the Agency.**

In 2007, the follow-up survey was developed. The survey was designed to be similar to the baseline survey, but expanded and revised to reflect changes in NIOSH initiatives and technological advances. The follow-up survey was developed in consultation with staff at Battelle, the contractor for the follow-up survey. Ms. Marianne Story-Yencken (Battelle Seattle office, 1100 Dexter Ave N, Suite 400, Seattle, WA 98109; Tel (206) 528-3164), a Certified Industrial Hygienist who is a member of the AIHA and the ASSE, assisted with the refinement of the questionnaire items based on her experience with a diverse range of industries, organizations and government entities, including the chemical industry, the automotive and shipbuilding industries, academic institutions, property management firms, the U.S. Postal Service, the Federal Bureau of Investigation, the Department of Energy, and several state and local governments. Lisa John, Ph.D., a Battelle project director with more than 15 years of survey experience (Battelle St. Louis office, 10420 Old Olive Street Road, Ste 300, St. Louis, MO 63141; Tel (314) 993-5234) consulted on the final content and wording of the survey questions and response categories. Ms. Stephanie Gray, an experienced TeleForm® programmer, (Battelle Durham Office, 100 Capitola Drive, Suite 200, Durham, NC 27713; Tel (919) 544-9154 ext. 102) offered input into the survey design to make it more reader-friendly and formatted the final survey. Mr. Charles Wolters, a statistician (Battelle Baltimore office, 6115 Falls Rd Ste 200, Baltimore, MD 21209; Tel (410) 372-2732) provided input on sample design and statistical procedures for analyzing results. The final draft was reviewed by 8 pilot test participants representing the four target professions. These individuals completed the draft survey and provided further recommendations regarding wording and content. Input from the pilot test was reviewed by the NIOSH Technical Monitor, the NIOSH Associate Director for

Health Communications, the NIOSH Coordinator for the National Academy Reviews of NIOSH Program Effectiveness, and Battelle team and incorporated into the final follow-up survey (Attachment C1). The final follow-up survey was also reviewed by the CDC Human Subjects Review Board and the Battelle Institutional Review Board.

### **A.9 Explanation of Any Payment or Gift to Respondents**

No direct financial payments will be provided to the respondents. We plan to use non-monetary incentives to help motivate sample members to respond to the survey, thus maximizing the response rate and improving the generalizability of the results. Respondents to the survey will receive two NIOSH CD-ROM products containing a variety of data bases and information sources dealing with significant occupational safety and health issues. The first is a compact disc entitled: NIOSH Scientific Information Products with featured information on Nanotechnology Safety. The CD provides information on NIOSH, its products, and its services. The CD, when inserted into a computer that is connected to the Internet, provides easy access to the full-text of nearly all of NIOSH's official publications, from the early 1970s through 2008. The CD provides links to the NIOSH Topic Pages and to NIOSH Programs including information on NORA, WorkLife, R2p, and Prevention through Design. Product types include journal articles, book chapters, numbered publications, abstracts/ proceedings, control technology reports, fatality assessment and control evaluation reports, fire fighter fatality investigation and prevention reports. The second is a compact disc which contains the text of the NIOSH Pocket Guide to Chemical Hazards, which also includes Recommendations for Chemical Protective Clothing plus a number of other databases.

As confirmed during our pilot test, the CD-ROMS are valued incentives to practicing occupational safety and health professionals, providing them with information resources they routinely access in their jobs. A similar incentive was provided to survey completers during the baseline; a response rate of 57% was achieved. Research indicates that mailing incentives along with the questionnaire raises response rates more effectively than promising an incentive upon receipt of a completed questionnaire.<sup>2</sup> Therefore, for the follow-up survey, Battelle will mail the incentive as part of the initial questionnaire mailing to further improve response rates.

### **A.10 Assurance of Confidentiality Provided to Respondents**

Participation in the survey is voluntary and anonymous. Planned analyses involve the collation and treatment of grouped data. While certain biographical data (professional training, type and size of organization for which respondent works, sector of work, and professional responsibilities) will be obtained for the purposes of relating professional background and job responsibilities to the reported utility of NIOSH information, all data collection is to be anonymous. No names or personal identifiers will be obtained or appear on the questionnaires. Battelle will obtain names and addresses of members from the four organizations and will randomly select 300 participants from each organization. The contact information will be used solely for the purpose of distributing the survey. Survey responses will not be linked to individual respondents; responses will be anonymous, and no identifying information is

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<sup>2</sup> Dillman, D. (2000) Mail and Internet Surveys. New York: John Wiley & Sons, Inc.

requested in the questionnaire.

To facilitate follow-up mailings, respondents will be asked to mail to Battelle a pre-addressed, post-paid Survey Response Card that will be included with the questionnaire mailing (Attachment C3). The respondent will indicate his/her name and address on the card and return it separately from the questionnaire. In this way, all questionnaire returns maintain anonymity. Those returning a Survey Response Card will have their name removed from the list to be contacted in the second round of mailings. Individuals who have not returned a Survey Response Card will be mailed a follow-up letter (Attachment C7) and a second copy of the questionnaire approximately four weeks after the initial contact. The list with names will then be destroyed. All surveys and survey response cards will be returned to Battelle at 10420 Old Olive Street Road, Suite 300, St. Louis, MO. After the questionnaire data have been transferred to an electronic file by Battelle and verified, the questionnaires and postcards will be destroyed.

The proposed data collection was reviewed by the CDC Human Subjects Review Board and the Battelle Institutional Review Board. Both boards determined that the proposed data collection does not meet the definition of research in 45 CFR 46 and is exempt (see letters of determination from CDC and Battelle, Attachments D1 and D2).

#### Privacy Impact Assessment Information

**A.** This submission has been reviewed by the NIOSH ICRO, who determined that the Privacy Act does not apply. Moreover, the ICRO determined that the present survey of Customer Satisfaction does not require a System of Records Notice (SORN). This determination was made after reviewing the guidance provided by the CDC Information Collection Request Procedures (Nov, 2007) pertaining to the Privacy Act (Appendix 5). In addition, the three NIOSH reviewers, including myself (Vernon P. Anderson, Ph.D.), have determined that the “Privacy Act does not apply.”

This determination is supported by the fact that the “2008 NIOSH Customer Satisfaction Survey” collects no personal information and includes no sensitive questions or questions about health status or illnesses. Moreover, no Information in Identifiable Form (IFF) is obtained via the survey (as noted in Appendix 6 of CDC’s guidance), and no database of information is maintained other than that required by the contractor, Battelle, to facilitate the survey process. This information will not be linked to the survey data, which will be anonymous. The sole purpose of this data collection effort is to determine if NIOSH is meeting its legislated mandate (OSHA Act 1970) “to provide the needed information and services to those occupational safety and health professional-practitioners who endeavor to ensure the safety and health of working men and women.”

**B.** The contractor, Battelle, will use security controls to protect against unauthorized access, modification, destruction or disclosure of data through access control and authentication. Security controls will protect privacy and confidentiality of survey information through technical controls, administrative controls and physical controls, as detailed below.

Technical Controls. Participant data obtained from the four associations and survey data collected during performance of this study will be stored in Battelle's secure databases on Local Area Networks (LANs) behind firewalls. Battelle will obtain names and addresses of members from the four organizations and will randomly select 300 participants from each organization. The contact information will be used solely for the purpose of distributing the survey. Survey responses will not be linked to individual respondents; responses will be anonymous, and no identifying information is requested in the questionnaire. Thus there will be no link between the database of sample members and the survey data. Analytical data sets may be stored on analysts' PCs when they are working with the data. All Battelle PCs are currently Windows XP Professional, Service Pack 2 and access is controlled.

Physical Controls. All servers are located in secure controlled access areas. Physical access to Battelle offices during non-office hours requires possession of an electronic card. During office hours all visitors can only enter through a staffed reception area where they are logged in and must be escorted at all times while on the premises. Within each Battelle office are additional secure areas that have secured access at all times. All server rooms require 24-hours electronic card access. Each electronic card is programmed for a specific user and provides that user with access to all areas to which they are authorized. Battelle offices also have alarm systems monitored by professional security agencies that are activated when the offices are vacant. Authorized users have individual access codes and all access, including invalid attempts, are logged. In addition to these general security measures, sensitive material including hardcopy survey forms and response cards will be stored in locked file cabinets when not in use. Only office administrators and staff authorized to work with these materials have keys to these file cabinets. Battelle staff are trained in these policies and periodically reminded of their importance. Battelle staff members are required to lock their computers when away from their desk using Windows XP Task Manager. Password-protected auto-locking is configured to activate after 10 minutes of inactivity.

Administrative Controls. Battelle's IT division maintains an intranet site on Cybersecurity Policies and Procedures that is accessible by all employees. This site includes staff responsibilities for protecting data and security requirements for protection of the network, PCs, mobile devices and the data residing on them. In addition, the IT division frequently sends emails to all staff reminding them of specific security issues, such as use of the internet, remote access, email safety, etc.

Battelle databases are backed up nightly to a folder on the server's hard drive and integrity is verified upon completion. The folder containing these full database backups is then backed up to tape as part of our network backup plan. The network backups provide nightly incremental backups and full backups on weekends for all data stored on Battelle LANs and WANs. Tapes are stored offsite at secure contracted facilities. Permissions to project databases are limited to staff members assigned to work on the project. Non-technical project staff can only access the data indirectly through applications and are authenticated by username and password when logging into the application. All PC-based files, folders, and applications are backed up nightly to a secure server in encrypted format using Connected DataProtector software. Laptops are backed up using this software when staff reconnects to the Battelle network. Files remain

encrypted while stored and only the owner of the files and the IT administrator has the encryption key. Staff can elect to backup or restore files at any time in addition to the automatic backup. Sample member information is always stored and transferred separately from analysis data. Only survey data will be transferred to NIOSH; participant data will be destroyed upon completion of the project. Battelle will transfer the final survey data to NIOSH upon the completion of the contract. This information will not be retained by Battelle beyond the end of the contract. Survey data will be retained and destroyed by NIOSH in accordance with the applicable CDC Records Control Schedule.

C. The IRB has determined that this data collection does not meet the definition of research in 45 CFR 46 and no consent documents will be used. The cover letter states that the intended use of the information is to help NIOSH better serve the information needs of the members of each organization and others working to protect the health of American workers respondents. No private information will be collected and there are no plans for sharing individual responses. Responses will be summarized by organization, in group form. The cover letter informs participants that their responses are anonymous and will be grouped with those of other participants. The letter also informs respondents that grouped responses will be provided to the leader of their organization.

D. Participation in the survey is voluntary and anonymous. Participants are informed about the voluntary nature of their response in the Battelle cover letter.

#### **A.11 Justification for Sensitive Questions**

No questions of a sensitive nature will be asked in the survey. This data collection does not request information about the respondent's Race and Ethnicity, which may be considered sensitive. Race and Ethnicity would not be attributes of interest for data analysis.

#### **A.12 Estimates of Annualized Burden Hours and Costs**

**Annualized Burden Hours.** The number of actual respondents per association necessary to derive inferences about population attitudes is 720. The estimated average response time to the survey for those who have used or referred to NIOSH publications (estimated 570 respondents) is 20 minutes. The estimated average response time to the survey for those who have never used or referred to NIOSH publications (estimated 150 respondents) is 6 minutes. This estimate is based on the 8-participant pilot test and our experience with the baseline survey.

Based on the baseline survey results, as further detailed in Section B.1., we anticipate that response rates will vary by organization. We anticipate that 67% (n=201) of industrial hygienists (AIHA members), 58% (n=174) of nurses (AAOHN members), 52% (n=156) of occupational medicine physicians (ACOEM members), and 63% (n=189) of safety engineers (ASSE members) will respond. Also based on baseline results, we anticipate that 96% of industrial hygienists (AIHA members), 67% of nurses (AAOHN members), 66% of occupational medicine physicians (ACOEM members), and 83% of safety engineers (ASSE members) will have used or referred to a NIOSH publication and will therefore complete the full survey at an average of 20

minutes each. The remainder will not have used or referred to a NIOSH publication and will complete only the first eight questions and the final two sections, requiring an average of 6 minutes. Overall, we estimate that the total annual burden for participation in this study is 205 hours.

**Table A.12-1. Estimated Annualized Burden Hours**

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Respondents familiar with NIOSH	NIOSH Customer Satisfaction Survey	570	1	20/60	190
Respondents not familiar with NIOSH	NIOSH Customer Satisfaction Survey	150	1	6/60	15
<b>Total</b>					<b>205</b>

**Annualized Cost to Respondents.** There are no costs to respondents other than their time. Four types of respondents will participate in this survey, as detailed in Table A.12-2. According to the Bureau of Labor Statistics, and based on 2006 figures obtained from the U.S. Department of Labor, Bureau of Labor Statistics Occupational Employment Statistics ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)), the average hourly wage for occupational health and safety specialists (including industrial hygienists) is \$28.50. For registered nurses, the average hourly wage \$28.71 per hour. The average hourly wage for general internists is \$77.34, and the average hourly wage for safety engineers is \$32.89. Using the above hourly figures, the total cost estimates for all respondents in the survey (based on a 60% response rate (180 completes) from each of the four professional associations) are provided in Table A12-2.

**Table A.12-2 Estimated Annualized Burden Costs**

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Industrial hygienists	65	\$28.50	\$1,852.50
Nurses	45	\$28.71	\$1,291.95
Physicians	40	\$77.34	\$3,093.60
Safety engineers	55	\$32.89	\$1,808.95
Total			\$8,047.00

### **A.13 Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

There are no capital, start up, operation, or maintenance costs to respondents associated with this proposed collection of information.

### **A.14 Annualized Cost to the Government**

The data collection will be completed within a 12-month period. The total cost to the government will be \$131,000. This figure includes \$118,500 in contract costs to Battelle and \$12,500 in other costs to the federal government.

### **A.15 Explanation for Program Changes or Adjustments.**

This is a request for reinstatement for the data collection.

### **A.16 Plans for Tabulation and Publication and Project Time Schedule**

Tabulation Plan: The analysis for this survey is simple and straightforward. The survey form is divided into sections containing items designed to measure use of NIOSH publications in addressing occupational safety and health issues, the credibility of NIOSH materials, ease of respondent access to NIOSH publications, importance of various types of publications and topic areas, familiarity with and perceived importance of NIOSH research partnerships, and respondent biographical factors (e.g., area of professional training, job responsibilities, sector). An examination of the distribution of responses to these items will allow for an evaluation of the effectiveness of NIOSH publications in terms of perceived value and practical application as a function of professional affiliation. Specifically, survey results will be presented as percentages of response. For each question and subquestion, the data will consist of the sum of the response frequencies divided by the number of respondents answering that question to form percentages. The percentages will be presented in tables, figures, and text. To enhance the informational value of the results, the data will also be broken down by the association with which respondents are affiliated. Illustrative table shells are presented below.

Table A.16-1 Illustrative Table Shell: Question 2 - Type of organization

	Total	AIHA	ASSE	ACOEM	AAOHN
	%	%	%	%	%
Company/business					
Labor organization					
Industry or trade association					
Hospital/clinic					
Private consultant					
Professional society staff					
Federal/State/Local government					
Other					

Table A.16-2 Illustrative Table Shell: Question 13 - Preferred method of obtaining NIOSH publications

	High preference				Low preference
	1	2	3	4	5
	%	%	%	%	%
Request from Website via e-mail					
Download from NIOSH Website					
Call NIOSH/CDC 800 Number					
Obtain literature on CD-ROM					
Request at NIOSH conferences					
Access via NIOSH eNews links					
Other					

**Publication Plan:** The main beneficiary of this survey will be NIOSH, in particular, the Education and Information Division, which has prime responsibility for the publication and circulation of NIOSH information products. The findings will be used internally by those involved in preparing various types of NIOSH documents so as to aid in future writing and distribution efforts, such as NIOSH’s Research to Practice (r2P) program and the Health Communication Program. Results will also be shared with other groups in NIOSH and other governmental agencies engaged in safety and health communication activities.

In addition, the survey results will be shared with the partner associations, namely, ACOEM, AAOHN, AIHA, and ASSE. The outcomes of the survey hold important benefits to their individual members. Ascertaining how NIOSH is meeting their current information needs and if and how they could be improved can lead to more useful products. The final report of the project is planned for presentation at program meetings of these organizations as well as for submission for publication in scientific journals identified with health communication issues.

**Project Time Schedule:** In preparation for requesting OMB clearance, we pilot tested the survey. While the OMB package is undergoing review, we will program the survey instrument, tracking system, and study website; obtain and de-duplicate the membership lists from the four associations; and set up the merge programs for the recruitment materials. The time schedule for the remainder of the project is shown below.

Table A.16-3 Project Time Schedule

Activity	Time Schedule
Fielding of Questionnaire	1-3 months after OMB approval
Analyses of Survey Data	4-8 months after OMB approval
Publication of Findings	30 months after OMB approval

A 1-year clearance is requested.

**A.17 Reason(s) Display of OMB Expiration Date is Inappropriate**

Not applicable. Display of OMB Expiration Date is appropriate for this study.

**A.18 Exceptions to Certification**

There are no exceptions to the certification.

