

Supporting Statement A for Paperwork Reduction Act Submission for

**Frame Development for the Residential Care Component of the
National Study of Long-Term Care Providers**

New OMB Application

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SUPPORTING STATEMENT

National Center for Health Statistics

Frame Development for the Residential Care Component of the National Study of Long-Term Care Providers

The National Center for Health Statistics (NCHS) seeks approval to collect data needed to develop an up-to-date sampling frame of state-regulated residential care facilities in the United States. The sampling frame will be used (1) to draw a nationally representative sample for the residential care facility component of a planned new survey, the National Study of Long-Term Care Providers (NSLTCP), and (2) to produce state-level summary estimates of residential care facilities. A one year clearance is requested for frame development. A separate package for the survey data collection for NSLTCP will be submitted in the future.

The specific data collection activities will be to contact state agencies to:

- confirm current state-specific licensing categories of residential care.
- obtain state lists of facilities for these licensing categories of residential care.

A. Justification

1. Circumstances Making the Collection of Information Necessary

Background

Section 306 [342k] (a) & (b) of the Public Health Service Act provides for the establishment of the National Center for Health Statistics (NCHS) and requires that NCHS perform statistical and epidemiological activities for the purpose of improving the effectiveness, efficiency, and quality of health services in the United States. A copy of this authorization is provided as Attachment A. NCHS performs these activities by collecting statistics on health care professionals, utilization of health care, and health care costs and financing. NCHS collects information from health care establishments within the major sectors of the health care system, including ambulatory care, inpatient care, and long-term care.

NCHS is launching NSLTCP, a new strategy for obtaining and providing statistical information about paid, regulated long-term care (LTC) providers in the United States, replacing its previously conducted periodic LTC provider surveys that include the National Nursing Home Survey (OMB No. 0920-0353, expiration 05/31/2007); the National Home and Hospice Care Survey (OMB No.0920-0298, expiration 07/31/09); and most recently, the National Survey of Residential Care Facilities (OMB No. 0920-0780, expiration 12/31/2012).

The NSLTCP is being designed to (1) broaden the NCHS coverage of paid, regulated LTC providers by including nursing homes, residential care facilities, home health care agencies, hospices, and adult day service centers; (2) use existing administrative data on LTC providers and users where available (i.e., nursing homes, home health agencies, and hospices); and (3)

collect primary data biennially from cross-sectional nationally representative sample surveys of LTC providers for which administrative data do not exist (i.e., residential care facilities and adult day service centers). Primary data collection will include a core module of key provider characteristics and practices and aggregate-level summary information on care recipients, with the possibility for rotating modules on emerging or timely policy- and practice-relevant topics.

This data collection will provide up-to-date frame information for the residential care facility component of NSLTCP. For NSLTCP, the definition of a residential care facility is one that is licensed, registered, listed, certified, or otherwise regulated by the state; provides room and board with at least two meals a day; provides around-the-clock on-site supervision; helps with activities of daily living (e.g., bathing, eating, or dressing) or health related services, such as medication supervision; serves primarily an adult population; and has at least four licensed, certified, or regulated beds. Facilities licensed to serve the mentally ill or the intellectually disabled/developmentally disabled populations exclusively are excluded. Nursing homes and skilled nursing facilities are also excluded, unless they have a unit or wing meeting the above definition and residents can be separately enumerated.

Privacy Impact Assessment

No data on individuals will be collected.

Overview of the Data Collection System

The information will be collected from state government representatives in 50 states and the District of Columbia. In obtaining state licensure lists, we will search all state websites, and talk by telephone with representatives in all states and the District of Columbia. State government representatives will be asked to construct an electronic file listing state-regulated residential care facilities. We estimate verification of contact information, response to a semi-structured telephone protocol, and development of a facility listing in an electronic format will take 2 hours and 35 minutes per state.

Items of Information to be Collected

Information to be collected for the sampling frame includes the name, address, phone number, and website (if available) of the residential care facility; name, phone number, and email address (if available) of facility director; licensure category; chain affiliation; ownership type; and bed size.

Information in Identifiable Form (IIF)

No individually identifiable information is being collected.

Identification of Website(s) and Website Content Directed at Children Under 13 Years of Age

There will be no websites directed at children under 13 years of age.

2. Purpose and Use of the Information Collection

No up-to-date nationally representative list of licensed residential care facilities exists that meets the NSLTCP's definition of residential care facilities.

The collected data will enable NCHS to 1) determine which providers should be in the sampling frame for the residential care facility component of the 2012 NSLTCP, 2) select a nationally representative sample of residential care facilities for that component of the NSLTCP, and 3) produce and release state-level summary residential care facility estimates (i.e., number of residential care facilities in each state, number of residential care beds in each state).

The information will be collected from state government representatives in 50 states and the District of Columbia. In obtaining state licensure lists, we will search all state websites, and talk by telephone with representatives in all states and the District of Columbia (Attachment E). State government representatives will be asked to construct an electronic file listing state-regulated residential care facilities. We estimate verification of contact information (Attachment D.1), response to a semi-structured telephone protocol (Attachment E), and development of a facility listing in an electronic format (Attachment G) will take 2 hours and 35 minutes per state.

Privacy Impact Assessment Information

NCHS will use the collected data to determine which providers should be in the sampling frame for the residential care facility component of the 2012 NSLTCP. The frame data will be used to select a nationally representative sample of residential care facilities for that component of the NSLTCP. NCHS will also use the data to produce and release state-level summary residential care facility estimates (i.e., number of residential care facilities in each state, number of residential care beds in each state).

No IIF is being collected.

3. Use of Improved Information Technology and Burden Reduction

Encrypted listings of the state's residential care facilities will be sent to NCHS via mail and electronically through a secure password-protected website to ensure the confidentiality of the data.

NCHS has designed the semi-structured telephone protocol to be brief. During that telephone call NCHS will just be confirming that the appropriate licensure categories of residential care facilities within each state have been identified and requesting an electronic file (preferably in Excel format) of the licensed residential care facilities for which the agency is responsible. Formats other than Excel can be negotiated on a case-by-cases basis, if an individual state cannot provide its file in Excel or doing so would be too burdensome on the state. NCHS will provide states with the specifications on what variables are needed in the files. To further reduce burden, where possible the data will be accessed from already existing state websites and electronic files.

4. Efforts to Identify Duplication and Use of Similar Information

The frame that will be developed will be used to draw a sample of residential care facilities for NSLTCP that is scheduled to be fielded starting in late 2012. (NCHS will submit a separate OMB submission for NSLTCP survey data collection in the future.) No up-to-date uniform list of residential care facilities currently exists at the national level. The most recent frame of these facilities was developed for the Assistant Secretary for Planning and Evaluation (ASPE), DHHS in 2009 for use in the 2010 National Survey of Residential Care Facilities (NSRCF); given turnover of establishments in this sector, NCHS concludes that the 2009 frame is too old for use in a 2012 survey. To create the up-to-date frame of state-regulated residential care facilities, NCHS shall employ, and build upon where appropriate, the approach and methodology used by ASPE to develop the December 2009 NSRCF frame, which is described in the *2010 National Survey of Residential Care Facilities Sample Frame Construction and Benchmarking Report* (available at <http://aspe.hhs.gov/daltcp/reports/2010/sfconst.pdf>).

5. Impact on Small Businesses or Other Small Entities

No small businesses are affected.

6. Consequences of Collecting the Information Less Frequently

This is a request for clearance to allow NCHS to conduct this collection for the first time. We will submit a revision for any additional future collections based on our experience from this first collection and need for an updated sampling frame.

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

This request fully complies with the regulation 5 CFR 1320.5.

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

- A. The 60-day notice soliciting comments on this project is in Vol. 76, No. 115, pages 34996-34997, 6/15/2011 (Attachment B). No comments were received.
- B. Efforts we have made to consult outside the agency include:
 - consulted with the contractor that developed the 2009 frame for the 2010 NSRCF about the timing and steps involved in the frame development process
 - Joshua M. Wiener, Ph.D.
Senior Fellow and Program Director
Aging, Disability and Long-Term Care, RTI International
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 - read the ASPE report by the contractor that described the 2009 frame development;

- and consulted with ASPE, DHHS—which sponsored the 2009 NSRCF frame development—about the frame development process.
 - Susan G. Queen, Ph.D.
 Director, Office of Data Policy, Office of the Assistant Secretary for Planning and Evaluation Department of Health and Human Services 200 Independence Avenue Washington, D.C. 20201
 202-690-6796
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9. Explanation of Any Payments or Gifts to Respondents

There will be no payments, gifts, or incentives.

10. Assurance of Confidentiality Provided to Respondents

The frame information (i.e, information about specific residential care facilities and the names of the facility directors) that state government representatives provide will be used exclusively for statistical purposes and will be treated in a confidential manner.

Confidentiality protection will be applied to the frame information (i.e., facility and facility director information) that respondents provide as assured by Section 308(d) of the Public Health Service Act (42 USC 242m) as follows:

"No information, if an establishment or person supplying the information or described in it is identifiable, obtained in the course of activities undertaken or supported under section... 306 may be used for any purpose other than the purpose for which it was supplied unless such establishment or person has consented (as determined under regulations of the Secretary) to its use for such other purpose and (1) in the case of information obtained in the course of health statistical or epidemiological activities under section... 306 such information may not be published or released in other form if the particular establishment or person supplying the information or described in it is identifiable unless such establishment or person has consented (as determined under regulations of the Secretary) to its publication or release in other form."

In addition, legislation covering confidentiality is provided according to section 513 of the Confidential Information Protection and Statistical Efficiency Act (PL-107-347) which states:

“Whoever, being an officer, employee, or agent of an agency acquiring information for exclusively statistical purposes, having taken and subscribed the oath of office, or having sworn to observe the limitations imposed by section 512, comes into possession of such information by reason of his or her being an officer, employee, or agent and, knowing that the disclosure of the specific information is prohibited under the provisions of this title, willfully discloses the information in any manner to a person or agency not entitled to receive it, shall be guilty of a class E felony and imprisoned for not more than 5 years, or fined not more than \$250,000, or both.”

Privacy Impact Assessment Information

- A. This submission has been reviewed by the NCHS Privacy Act Liason and the NCHS Confidentiality Officer. It has been determined that the Privacy Act does not apply. No IIF is being collected.
- B. Data will be treated in a confidential manner. The process of informing respondents of the procedures used to keep information confidential begins with materials mailed in advance to state government representatives (Attachments D.2-4). The NCHS cover letter, professional association letters of support, and NCHS' Confidentiality Brochure will include specific references to protections of the frame information. These materials will include all elements of informed consent. These materials will also emphasize and detail procedures intended to keep information confidential by the data collectors.
- C. All informed consent procedures and methods for maintaining confidentiality will be reviewed and approved by NCHS' Confidentiality Officer, when necessary. This data collection effort is not human subjects research (Attachment C).
- D. During phone calls and in any written materials (i.e. letters) confidentiality, voluntary participation, legislative authority, and potential uses of the data will be explained.

11. Justification for Sensitive Questions

Data collected will not include sensitive questions.

12. Estimates of Annualized Burden Hours and Costs

A. Burden Hours

Table 1 includes the average annual burden for frame development over the one year clearance. Fifty states and the District of Columbia will be surveyed. Burden is estimated at 5 minutes for contact information verification, 30 minutes for a semi-structured telephone protocol, and 2 hours to develop the facility listing in an electronic format. The total estimate of annualized burden is 132 hours.

Table 1: Estimated Annualized Burden Hours

Type of Respondent	Form Name	Number of Respondents	Number of Responses	Average Burden/ Response (in hours)	Response Burden in Hours
State Govt. Rep.	Contact Info Verification	51	1	5/60	4
State Govt. Rep.	Telephone protocol	51	1	30/60	26
State Govt. Rep.	Electronic file Development	51	1	2	102
Total					132

B. Cost to Respondents

The only cost to respondents is their time. The estimated annualized cost for the national survey is \$2,640.00 (Table 2).

Table 2: Estimated Annualized Costs for Frame Development

Type of respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
State Government Representatives	132	\$20.00 ¹	\$2,640.00
Total			\$2,640.00
Information on community and social services state government occupations hourly wage rate gathered from the Bureau of Labor Statistics' website, and can be accessed at the following link: http://www.bls.gov/oes/current/oes_nat.htm#21-0000			

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs.

14. Annualized Cost to the Federal Government

The estimated total cost to the Government is shown in Exhibit 1.

Exhibit 1: Estimated Annualized Costs to the Government

Item/Activity	Details	\$ Amount
NCHS oversight of contractor and project	Cost for staff and supplies	\$71,636
Frame Development (Contractor)	Field staff costs, including data collection costs and other direct costs	\$358,180
Estimated Total Cost		\$429,816

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publications and Project Time Schedule

OMB clearance is requested for a period of one year. Data collection for frame development will begin once we have OMB approval. NCHS will search state websites first, and then contact state government representatives through letters and telephone calls for additional information. Receipt of an electronic listing of residential care facilities in each state will end data collection. The sampling frame constructed will be used as part of the development of data collection

NSLTCP. However, the frame development (i.e., information on individual facilities) is confidential and no public use file is anticipated. NCHS will release state-level summary estimates based on the frame data within 24 months of collection.

Exhibit 2: Major NSLTCP Frame Development Activities and Timeframe

Major NSLTCP Frame Development Activities	Timeframe
Search state websites	1-6 months after OMB approval
Contact state government representatives	1-6 months after OMB approval
Confirm mailing address	1-6 months after OMB approval
Mail advance package	1-6 months after OMB approval
Semi-structured telephone/email correspondence	1-6 months after OMB approval
Building of electronic listing	1-7 months after OMB approval
Electronic listing complete and delivered to NCHS	5-7 months after OMB approval
Release of state-level summary estimates	24 months after OMB approval

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

No exemption requested.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to the certification.