

Information Collection Request

Reinstatement with Change

OMB # 0920-0566

Using a Reader Response Card to Assess Worker Notification Materials

Supporting Statement Part A

Submitted by:

Amy Mobley
Project Officer

National Institute for Occupational Safety and Health
Division of Surveillance, Hazard Evaluations and Field Studies
Surveillance Branch, Mail Stop R-13
4676 Columbia Parkway
Cincinnati, OH 45226-1998

Phone (513) 841-4343
e-mail: frj4@cdc.gov

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Attachments

- Attachment A Occupational Safety and Health Act, NIOSH, under Section 20(a)(1), (a)(4), (a)(7)(c), and Section 22 (d), (e)(5)(7) of the Occupational Safety and Health Act (29 U.S.C. 669) and 22
- Attachment B 60 day Federal Register Notice
- Attachment C Reader Response Postcard
- Attachment D Sample notification materials to workers: notification letter
- Attachment E Beryllium Fact Sheet
- Attachment F Human Subjects Review Board memo waiving review

JUSTIFICATION

A1. Circumstances Making the Collection of Information Necessary

Background

This is a Reinstatement with Change of a previously approved information collection request (0920-0566). The title has been changed from the previous title of “Use of a Reader Response Postcard for Workers Notified of Results of Epidemiologic Studies Conducted by the National Institute for Occupational Safety and Health (NIOSH) to “Using a Reader Response Card to Assess Worker Notification Materials”. Other than this change to update the title in Reginfo.gov, there are no other changes. Although the research studies continued, the notification activities were discontinued after the extension ICR was not submitted to OMB before the original expiration date of 2/28/2011.

The National Institute for Occupational Safety and Health (NIOSH) Institute-wide Worker Notification Program routinely notifies subjects about the results of epidemiologic studies and the implications of the results. The overall purpose of the proposed project is to obtain feedback on NIOSH worker notification communication materials to improve quality and usefulness. Health Communication Specialists from the NIOSH Division of Surveillance, Hazard Evaluations and Field Studies (DSHEFS) propose to routinely send the Reader Response card (**Attachment C**) to notified study populations.

NIOSH, under Section 20(a)(1), (a)(4), (a)(7)(c), and Section 22 (d), (e)(5)(7) of the Occupational Safety and Health Act (29 U.S.C. 669), has the responsibility to "conduct (directly or by grants or contracts) research, experiments, and demonstrations relating to occupational safety and health, including studies of psychological factors involved, and relating to innovative methods, techniques, and approaches for dealing with occupational safety and health problems." NIOSH also has the responsibility to "conduct special research, experiments, and demonstrations relating to occupational safety and health as are necessary to explore new problems, including those created by new technology in occupational safety and health [e.g., worker notification], which may require ameliorative action beyond that which is otherwise provided for in the operating provisions of the Act" (*Attachment A*).

Since 1977, the National Institute for Occupational Safety and Health (NIOSH), Centers for Disease Control and Prevention (CDC), has been developing methods and materials to inform study populations of epidemiological study results. This follows current policy. The extent of the notification effort depends upon the level of excess mortality or the extent of the disease or illness found in the cohort. Current notification efforts range from posting results at the worksites studied to mailing a letter and factsheet to the study population and other stakeholders. The Industry wide Studies Branch (IWSB), Division of Surveillance, Hazard Evaluation, and Field Studies (DSHEFS), of NIOSH usually conducts about two or three notifications per year, which typically require individual letters mailed to study population ranging in size from 200 - 20,000 workers each (*Attachment D*). The reader response card was developed to continue to improve

notification materials and future risk communication efforts.

Despite literature on risk communication in the general population and on the communication of specific risks to workers, the usefulness of these communications still is not well known. Although there is consensus on the importance of risk communication in fulfilling citizens' right to know about risks and providing them opportunities to take action, how to accomplish this properly remains the subject of debate.

Privacy Impact Assessment

Overview of the Data Collection System

The Industrywide Studies Branch (IWSB), Division of Surveillance, Hazard Evaluation, and Field Studies (DSHEFS), of NIOSH usually conducts about two or three notifications per year, which typically require individual letters mailed to study populations ranging in size from 200 - 20,000 workers each. The reader response card was developed to obtain feedback on notification materials sent to study populations. The feedback received will improve future risk communication efforts. The Reader Response card is a customer survey tool, which will be completed by workers who receive notification materials from NIOSH. The overall purpose of reader response card is to improve the quality and usefulness of the Institute's worker notification program.

Items of Information to be Collected

The data collected will provide feedback on the intermediate effectiveness of the notification – did the worker understand the information; did they consider taking action on what was sent, etc. No individually identifiable information is being collected.

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

The information collection does not involve any web-based data collection or websites specifically directed at children under 13 years of age.

A2. Purpose and Use of Information

Worker notification is a means of providing study results and implications to the worker populations included in NIOSH studies. The overall purpose of reader response card is to improve the quality and usefulness of the Institute's worker notification program. NIOSH conducts individual notifications regarding epidemiologic studies for which any of the following conditions apply: 1) the level of occupational disease risk has been determined to be significantly increased above the levels in the U.S. population (or other more local rates); 2) human subjects have actively participated; or 3) the level of public interest and controversy surrounding a study merits a response from NIOSH, regardless of the study's outcome. IWSB normally conducts two or three notifications per year. Worker notifications routinely include a letter from NIOSH to study subjects, plus other enclosures, such as a study fact sheet and health-related information.

Privacy Impact Assessment Information

The Reader Response card is a voluntary, inexpensive mechanism to obtain recurring feedback on the intermediate effectiveness of the notification – did the worker understand the information; do they have any suggestions for improving, etc. The postcard is

intended as a quick assessment tool , used to routinely improve notification materials. It is not intended for use as a true program or project evaluation. Feedback from these postcards allow the NIOSH worker notification program to improve future notification efforts.

The feedback received from the Reader Response cards will be used to standardize and streamline written notification materials (***Attachments D & E contains a sample notification letter and fact sheet***) and develop materials which are more readable, understandable, and informative to notified workers, their families, and other stakeholders. In addition to answering the questions identified on the card, the respondent will have the opportunity to fill in comments, suggestions, or ask for additional information from NIOSH. The objective of the Reader Response postcard, therefore, is to provide standardized feedback tool which will capture the recipient's responses concerning the usefulness of NIOSH notification materials.. The proposed information collected will have little or no effect on the respondent's privacy. No individually identifiable information is being collected.

A3. Use of Improved Information Technology and Burden Reduction

The Reader Response card will be provided in English and provided in Spanish or other languages as needed. Only the minimum information necessary will be collected.

Potential respondents may not have access to a computer or the internet; therefore, data will be collected on a paper copy of the Reader Response card.

A4. Efforts to Identify Duplication and Use of Similar Information

Feedback forms with the specific kind of information useful for improving worker notification activities are not currently available at NIOSH. NIOSH has unique duties regarding notification of workers about their risk and to assess the effectiveness of worker notification activities. The effort described herein is targeted specifically to workers who may have a risk to workplace exposures and to provide health protection advice that they can follow.

A5. Impact on Small Businesses or Other Small Entities

No small business will be involved with any of the worker notifications.

A6. Consequences of Collecting the Information Less Frequently

The notification materials received by the recipients and future communication of risk information will be more effective with the use of the proposed feedback tool. NIOSH will request only one Reader Response card from each respondent. There are no legal obstacles to reduce the burden.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances associated with this data collection activity.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A. A notice of the intended information collected was published in the Federal Register

on January 26, 2012 (Volume 77, Number 17), pgs. 4046-4047, as required by 5 CFR 1320.8(d). (**Attachment B**). No comments were received.

B. The Reader Response card was reviewed by the professionals listed below.

Carolyn Needleman, Ph.D. (retired)
Professor
Director of Occupational & Environmental Health Program
Graduate School of Social Work & Social Research
Bryn Mawr College
300 Airdale Road
Bryn Mawr, PA 19010-2899
610/520-2633

Dr. Needleman has been a consultant to various NIOSH worker notification evaluation studies in the past.

David P. Brown, MPH
Director of Scientific Program Research Development
The Constella Group
RTP, NC 27709-2233
919-547-0970

David Brown was the Assistant Chief of the NIOSH Industrywide Studies Branch before taking a position at NIEHS, and is very familiar with the NIOSH Worker Notification Program since its inception.

A9. Explanation of Any Payment or Gift to Respondents

No payments or gifts will be offered to respondents as remuneration for their participation.

A10. Assurance of Confidentiality Provided to Respondents

No assurance of confidentiality will be provided. Respondents will not be asked to provide personal information. Furthermore, no sensitive information will be collected.

The NIOSH Human Subjects Review Board (HSRB) has determined that this feedback

tool does not meet the criteria of research as defined by DHHS, therefore HSRB approval is not required (*Attachment F*).

Privacy Impact Assessment Information

- A. This submission has been reviewed by the Information Collection Review Officer who determined that the Privacy Act is not applicable.
- B. No personal identifiers will appear on the information collected from any of the respondents. The completed Reader Response card will be identified only by a number linked to a master list of names kept in a locked file. Care will be taken so that reported data contain no personal information that could compromise the anonymity of individual respondents. The identification numbers will be used only as a means for NIOSH to respond to workers in writing concerning their questions or requests, as noted in the “Comments” section of the postcard. The list linking the study ID number with the name will be destroyed as soon as data collection is complete and follow up has been completed with those requesting further information.
- C. Respondents will not be asked to provide consent.
- D. Returning the Reader Response card is strictly voluntary. There is no penalty for non-response.

A11. Justification for Sensitive Questions

The Reader Response card does not contain any questions of a sensitive nature. No personal data will be collected from worker respondents.

A12. Estimates of Annualized Burden Hours and Costs

The actual number of notifications required in a given year cannot be known in advance. Each year, NIOSH, DSHEFS, IWSB typically prepares materials for two to three completed studies. This often requires individual letters be mailed to study populations ranging in size from 200 – 20,000 workers each, averaging 8,000/yr. No direct costs will accrue to respondents other than their time to complete the Reader Response card. The Reader Response card was tested internally and the average time to complete was less than 10 minutes.

A. Estimates of Annualized Burden Hours and Costs

Form Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Reader Response Card	8,000	1	10/60	1,333
Total				1,333

B. Annualized Cost to Respondents

Type Respondent	No. of Respondents	No. of Responses per Respondent	Avg. Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Notified Workers	8,000	1	10/60	1,333	\$12.00	\$16,000

The wage rate used of \$12.00 per hour was estimated based on the following information: 1) the current minimum wage rate is \$7.40 per hour; 2) the U.S. Department of Labor, Bureau of Labor Statistics Occupational Employment Statistics for May 2010 shows a median hourly wage rate for Office Clerks, General to be \$12.79; 3) some former workers are retired and probably no longer earning a wage; 4) some current workers will undoubtedly be earning more than the minimum wage; and 5) the certainty that wage rates of current industrial workers are higher than \$7.40 per hour.

A13. Estimates of other Total Annual Cost Burden to Respondents or Record

There are no capital or maintenance costs to respondents.

A 14. Estimates of Annualized Government Costs

The conduct of this task will involve in-house personnel expenses and Reader Response card mailing costs. The costs for a 12-month period are estimated as follows:

A. Cost to Federal Government:

	<u>FY 2012</u>
Clerical Assistants	\$1800.09
Health Communication Spc.	\$ 471.61
Supplies	\$ 250.00
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* Total Annual Costs	\$2521.70

* Total costs are based upon the following estimates: 10% of the estimated 8,000 postcards mailed will be returned by workers = 800 postcards. In the first year of the project, a Clerical Assistant will process the postcards at an average 5 minutes per postcard or 12 per hour (800 / 12 = 66.67 hours) x \$27.00 per hour wage rate = \$1800.09. The Health Communication Specialist will review the returned cards (approximately 10%) and will respond via phone calls or in writing to workers who require a response. It is estimated that the average time spent for review and response per each card will be approximately 10 minutes, for a total of 800 minutes or 13.33 hours. At a wage rate of \$35.38 per hour, the total cost would be \$471.61. As no annual salary increases are expected for the next several years, no increase in annual cost is anticipated.

A15. Explanation for Program Changes in Hour Burden

This is a request for reinstatement, no changes have been made.

A16. Plans for Tabulation and Publication and Project Time Schedule

The use of the Reader Response card will be ongoing for all individual letter worker notifications. The approval period requested is for three years. Data collection will begin immediately following OMB clearance and ending 36 months thereafter, followed by a request to continue use of the feedback tool. During this time, all collected data will be assessed and the results used to further develop and refine the NIOSH worker notification process.

A.16.1-1 Project Time Schedule

A projected time schedule for the project from the time of OMB approval is described below.

A typical letter-type notification will take about six months and will be repeated for each successive notification.

<u>Time Schedule</u>	<u>Activity</u>
Month X	Obtain OMB approval
Month 1	Mail notification materials with Reader Response postcard
Month 2-4	Reader Response cards returned to NIOSH NIOSH responds to comments
Months 5	Analyses of results
Month 6	Report results
Months 7 - 36	Repeat the above activities for approximately 15 - 20 additional notifications.

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

Display of the expiration date for the OMB approval of the information collection is

appropriate for this project.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are requested.