REQUEST FOR CLEARANCE OF FORMATIVE AND PROCESS EVALUATION OF COMMUNICATION CAMPAIGN WITHIN THE LATINO COMMUNITY ON RIGHT TO NON-DICRIMINATION IN CERTAIN HEALTH AND HUMAN SERVICE PROGRAMS

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TABLE OF CONTENTS

A. JUSTIFICATION

A.1 Circumstances That Make the Collection of Information Necessary

This Information Collection Request (ICR) is for a new data collection entitled Campaign Within the Latino Community on Right to Non-Discrimination in Certain Health and Human Service Programs. The request is for one year starting from the date of OMB approval.

Background

The Office for Civil Rights (OCR) in the Department of Health and Human Services (HHS) enforces nondiscrimination regulations that apply to programs, services, and activities receiving HHS federal financial assistance. OCR helps protect patients from unfair treatment or discrimination, because of the patient's race, color, national origin, disability, age, sex (gender), or religion. Further the Civil Rights Division (CRD) within OCR promotes and ensures that people have equal access to and opportunity to participate in certain health care and human services without facing unlawful discrimination. CRD carries out this mission by enforcing Federal laws and regulations that prohibit discrimination, including health care provider conscience rights, on the basis of race, color, national origin, disability, age and, in certain circumstances, sex and religion, in programs and activities that receive financial assistance from HHS. CRD also enforces a Federal law and regulation that prohibit discrimination on the basis of disability in health care and social service programs of state and local governments.

OCR promotes and ensures compliance with the Civil Rights Laws by: Investigating complaints filed by individuals alleging that that have or someone else has been discriminated on a prohibited basis; Conducting compliance reviews of covered entities that OCR believes may not be in compliance with the law; Providing technical assistance to covered entities to help them understand how they can voluntarily comply with the law; Conducting outreach nationwide to help individuals and covered entities understand rights and obligations under the laws that OCR enforces.

OCR is requesting Office of Management and Budget (OMB) approval of formative and process evaluation for a Campaign within the Latino Community on Rights to Non-Discrimination in Certain Health and Human Service Programs. The contract for this campaign has been awarded and the contractor requires OMB clearance to carry out the formative and process evaluation tasks within the contract.

The purpose of the contract is to conduct a campaign to reach adult Latino patients and caregivers, including those with Limited English Proficiency (LEP) in order to:

- Examine attitudes toward, and experience with discrimination in health care.
- Increase patient awareness of what constitutes discrimination in health care.
- Inform patients of what they should do and whom they should contact should they ever experience discrimination in health care.
- Study effective ways to lessen discrimination against Latinos by health care providers.

- Use paid and earned media to communicate with Latinos and inform them about their right to non-discrimination when seeking medical care, as well as OCR's role in protecting those rights.

The contractor will coordinate the comprehensive communication outreach campaign strategy with other OCR funded activities, such as outreach conducted by OCR Regional Offices at the local level. Contractor will use a comprehensive, integrated approach that includes regional marketing to successfully communicate with target audiences in creative, effective ways. Activities could include, but are not limited to, targeted paid advertising, earned media support and grassroots outreach.

This request for clearance is to conduct formative and process evaluation to inform campaign activities, including the design and revision of messages and collateral materials.

Privacy Impact Assessment

Overview of Data Collection System

We propose using multiple methods to conduct formative and process evaluation of the communication campaign. These methods will be used during the campaign period as a means to identify relevant messages and materials, to collect feedback on proposed messages and materials to be disseminated, and to identify relevant channels to be used for dissemination. The methods we propose include in-person focus groups and an online survey, both of which would include messages and materials testing. The information collected through each method will be used to assist in the design of campaign messages and materials such as brochures and fact sheets, used to educate the public on their right to nondiscrimination in health care and certain human services. The information will also be used to evaluation and assist in the possible redesign of messages and materials currently used out in the field.

Items of Information to be Collected

The following topics will be covered in the data collections (See Attachments 3, 4, 5, and 6 for copies of instruments).

- Individual's role in health care decision making within Latino households
- Latinos overall experience with health care providers
- Knowledge and awareness of discrimination in health care
- Latino experience with discrimination in health care
- Experience reporting instances of discrimination in health care
- Knowledge of methods to report discrimination in health care
- Access and use of diverse information sources and channels
- Demographics specific to diverse Latino communities throughout the U.S.

Identification of Contents Directed at Children Under 13 Years of Age.

The campaign is targeted at adults 18 years of age and older. No information or data collection in this project is directed at children under13 years of age. Participants in all studies will be adults 18 years of age or older.

A.2 Purpose and Use of Information Collection

OCR aims to conduct an effective communication campaign that meets the goals outlined in the background section. To ensure OCR is creating and disseminating messages and materials that can best address the concerns and informational needs of the intended Latino audiences and meets the campaign goals, OCR requires research among the target audience to ensure messages and materials are audience-appropriate and that they are disseminated to the target audience in the most effective way possible. If OCR does not have information about how to best reach and communicate with the target audience, OCR will be unable to ensure communication efforts are done in the most impactful and efficient manner possible.

Research and feedback will be conducted through in-person focus groups and online sessions. For messages and materials, participants will be asked questions about existing and proposed messages and materials. Participants will be asked various questions including their knowledge of their right to non-discrimination in certain health care and social agencies, their experience with discrimination in health care and their knowledge of OCR and the process for filing a complaint if they believe their (or someone else's) rights have been violated. Data gathered from the studies will help guide and be directly applied to campaign activities.

Privacy Impact Assessment

The information in the proposed studies is being collected to inform campaign activities. Because only the targeted Latino audience can successfully and efficiently report on the effectiveness of campaign messages and materials and weather the outreach campaign will successfully reach the targeted Latino community, the information must be collected directly from targeted campaign audience members. The information provided by respondents will be applied directly to existing or newly created messages and materials.

The proposed information collection activities will have little or no effect on respondents' privacy. The only information in identifiable form (IIF) in the studies will be names, telephone numbers, and unique computer log-in numbers which will be used by the contractor to screen and conduct interviews with participants. No personal identifiers will be linked to data or provided to HHS. Analysis will be conducted on data sets that only include respondent ID numbers and no IIF. All data collection instruments will be located in locked file cabinets or on password protected computers, and accessible only by contractor project staff. For the data collected by commercial survey firms, OCR and its contractor will receive the final tabulated results without any IIF. No sensitive data will be collected through any of the research being conducted.

A.3 Use of Improved Information Technology and Burden Reduction

The studies will use two modes of data collection:

The first mode will be in-person data collection through focus groups. One focus group will be comprised of female Latino caregivers or patients (including LEP individuals), while a second focus group will be conducted among male Latino (including LEP individuals) caregivers or patients. Each focus group will be conducted in Spanish, with simultaneous translation for non-Spanish speaking group observers and data analysts. The focus groups will be recorded by audio and video tape to enable everything being said to be captured. Although the recordings will be used to assist the contractor in writing their focus group findings report to OCR, all tapes will be destroyed upon completion of the final campaign report.

The second mode used will be data collection through an online interview survey of LEP and bilingual (Spanish and English) Latino speakers nationwide. This mode of technology will allow respondents to complete the survey at their convenience, with data programmed directly into a database by the respondent; allowing for more efficient, honest and reliable reporting of results than can sometimes be achieved through in person interviews or focus groups. Online survey participants are recruited using a hybrid telephone recruitment design based on a random-digit dialing sample of U.S. Latino and Hispanic-surname individuals. This geographically balanced sample covers areas that when aggregated, encompass approximately 93 percent of the nation's 45.5 million Latinos. This sampling along with providing computers and internet access to any panel member without internet access, allows us to reach a representative sample of Latinos nationwide in an extremely cost effective manner. In addition, this mode of technology helps to reduce the burden on participates as well as those implementing and analyzing the testing.

A.4 Efforts to Identify Duplication

OCR worked with Momentum Analysis to conduct an extensive environmental scan that included multiple literature searches. OCR identified numerous surveys from the public and private sector that asked general questions about the public's knowledge of and concerns about minority health issues and racial and ethical disparities in healthcare, but did not find prior or current research related to specific messages and sources of information about the issues to be addressed by this campaign.

OCR did not locate any studies that have tracked or are currently tracking public knowledge and awareness about individuals' rights to equal access to and opportunity to participate in certain health care and human services programs, without facing unlawful discrimination, and the right to file a complaint if an individual thinks these rights have been violated. OCR also conducted a content review of existing minority health messages and materials available to the public and providers, and found a large gap in the information available related to individuals civil rights in health care, reinforcing the need for the proposed education and communication campaign.

A.5 Impact on Small Businesses or Other Small Entities

No small businesses or entities will be involved in or impacted by this data collection request.

A.6 Consequences of Collecting the Information Less Frequently

This request is for a clearance to conduct a one-time only formative and process evaluation during the term of the campaign. The evaluation is intended to inform and improve the design and dissemination of campaign products. If the collection is not conducted, OCR has no way to analyze whether the campaign messages and materials are effective in educating and informing the Latino community about their rights. Testing will be conducted on draft messages and materials when they are ready. There are no legal obstacles to reduce the burden.

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

Two types of data collection activities (Focus Groups and Online Interviews) may be conducted under the auspices of this request. Each activity is anticipated to be a one-time collection. This data collection request fully complies with all relevant regulations.

A.8 Comments in Response to the *Federal Register* Notice and Efforts to Consult Outside the Agency (FR 60-day notice Volume 77, Page Number 23721 (April 20, 2012. No comments.

b. OCR has consulted with the following persons regarding this information collection:

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A.9 Explanation of any Payment or Gift to Respondents

Patients and caregivers will receive $75.00 for their participation in the focus groups. In addition to compensating participants for their time, compensation is provided to give participants adequate incentive to attend and arrive on time at a focus group discussion.

Participants in the web-based survey receive points for participating, receiving payment after they have accumulated a certain number of points. Panelists receive cash-equivalent checks from

the panel administrator approximately every four to six months in amounts reflecting their level of participation in panels; commonly resulting in distributions in the range of $4 to $6 per month.

A.10 Assurance of Confidentiality Provided to Respondents

Participation in the data collection is voluntary and respondents will be so informed before beginning the survey or focus group. Respondents will further be informed that the information they disclose will be held in a secure manner and will not be disclosed, unless otherwise compelled by law.

Respondent names, phone numbers and unique log in IDs are the only information in identifiable form (IIF) that will be used by the contractor to screen and conduct focus groups with participants and track responses to web-based surveys. Names and phone numbers will not be linked to the data or provided to HHS. All data will be securely stored in locked file cabinets or password-protected computers, and accessible only to contract project staff. Names and phone numbers of respondents will not be kept in a system of records, and will be destroyed at the end of the study. For the data collected by commercial survey firms, OCR and its contractor will receive the final tabulated results without any information in IIF. No sensitive data will be collected in any of the studies.

A.11 Justification for Sensitive Questions

None of the items in the studies are considered sensitive. Participation in the research is completely voluntary, individuals are not required to respond to the requests for participation, and respondents may decline to answer any question in the studies. The voluntary aspect of the studies will clearly be stated in the introductions to all data collection modes and will be stressed to moderators in the orientation they receive concerning the study to be conducted.

A.12 Estimates of Annualized Burden Hours and Costs

A. Annualized Burden Hours

Estimated response burden hours for respondents for the two types of data collections are shown in Table 12A. The estimated times for each type of collection is based on previous experience with administering similar studies. The total burden hours requested is 214 for this one year period.

Table 12A. Estimates of Burden Hours

	Number of respondents	Average # of responses per respondent	Average burden hours per response	Total burden hours
Screening for focus group sessions	40	1	6/60	4
Focus group sessions	20	1	2	40
Web-based interviews*	600	1	17/60	170
Total	660	N/A	N/A	214

*assumes existing web panel

B. Annualized Burden Costs

Respondent costs were calculated using the most recent National Compensation Survey data from the U.S. Bureau of Labor. National Compensation Survey: Occupational Earnings in the United States, 2010 http://www.bls.gov/ncs/ncswage2010.htm. The hourly rate used is $22.77. Total estimated respondent cost is $4,349.07 over the year.

Table 12B. Estimates of Respondent Costs

	Response Burden in Hours	Hourly Rate	Total respondent Cost
Screening for focus group sessions	4	$22.77	$91.08
Focus group sessions	40	$22.77	$910.80
Web-based interviews*	170	$22.77	$3870.90
Total	214	$22.77	$4872.78

*assumes existing web panel

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

Other than their time to participate in the studies, there will be no direct costs burden to respondents.

A.14 Estimates of Annualized Costs to the Federal Government

The total annual cost to the Federal Government is estimated at $60,000 for the term of the clearance. This estimate includes data collection, analysis and reporting costs associated with the 2 types of collection, and the cost of federal employees involved in project oversight.

OCR estimates the following costs in setting up testing environments and collecting, analyzing and summarizing data:

- Developing study protocols and materials: $5,000
- Moderators and usability experts to conduct research: $22,000
- Study participant recruitment: $3,000
- Meeting space for data collection: $2,000
- Study participant stipends: $3,000
- Data summary and reports: $5,000

- Government employee oversight: $10,000

Estimated Annualized Cost to Government**:** $50**,** 000

A.15 Explanation for Program Changes or Adjustments

Because this is a new collection of information, there are no program changes or adjustments.

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

Focus groups and online interviews

Focus groups and online interviews are qualitative methods used to identify the informational needs and wants of the intended users of the communication products. These methods also help ensure target audiences understand the messages and materials in the way intended and that the materials accurately provide target audiences with the information they need. The data is qualitative and analysis focuses on identifying dominant trends and issues across targeted participants. Collection of the data will allow problems that emerge repeatedly with the proposed messages and materials, to be spotted and corrected.

No complex or analytical techniques will be used for the results of the collection of information. Findings from all data collection will be included in individual summary reports submitted to OCR. The reports will describe the methods used for collection, findings, conclusions, implications, and recommendations for use of the data when finalizing campaign messages and materials. There will be no specific quantitative analysis of data and no attempt will be made to statistically project the findings onto the broader national population.

Table A-16 Project Time Schedule

Activity	Time schedule (based on OMB approval date)
Focus groups and analysis	1-2 month after OMB approval
Online interviews and analysis	2-3 months after OMB approval

A.17 Reasons Display of OMB Expiration Date is Inappropriate

There are no reasons display of the OMB expiration date is inappropriate. All information collection materials for this campaign will display the date OMB approval of the information collection expirers.