

# Supporting Statement for OS Think Cultural Health

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**OMB Cont.:** #0000000  
**Title:** OS Think Cultural Health  
**Program:** DHHS/OS/OMH  
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## A. Justification

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

The Office of Minority Health (OMH), Office of the Secretary (OS), Department of Health and Human Services (HHS) is requesting approval from OMB for the registration component of the Think Cultural Health (TCH) website program. The TCH website is used to post information such as cultural competency, language access and health disparities articles, and notices of health disparities conferences for visitors to the site. Users must be registered to participate.

The Office of Minority Health (OMH), Office of the Secretary (OS), Department of Health and Human Services (HHS) is requesting approval from OMB for the Think Cultural Health (TCH) website program. The TCH website is used to post information such as cultural competency, language access and health disparities articles, and notices of health disparities conferences for visitors to the site. The TCH website is unlike other government sites, in that it offers users the ability to gain cultural health competency credits through on-line training and resources in addition to offering users the option of receiving a newsletter.

The TCH website program was created in recognition of the effectiveness of on-line distance learning. It supports the HHS/OS/OMH in complying with the cultural competency requirements of the Patient Protection and Affordable Care Act of 2010 (ACA) (P.L.111-148) (**Attachment A**), as well as the Secretary's Plan to Reduce Racial and Ethnic Health Disparities, the National Stakeholder Strategy for Achieving Health Equity, Healthy People 2020, the Secretary's Strategic Plan priorities, and the Assistant Secretary for Health's Public Health Quality Agenda.

### 2. Purpose and Use of Information Collection

Information will be collected directly from the website registrants/users by completing a universal online website registration form (**Attachment B**) used by all individuals who wish to register to receive a monthly newsletter through the site or to complete training

offered on the site. Use of the resources offered on the site is voluntary, but registration information is required to determine if the site is used by a variety of health professionals, representing different disciplines, skill sets, and demographic locations.

The information being collected by the system pertains to health professionals that have elected to receive a monthly newsletter distributed via e-mail through the site, or to complete training offered on the site. Information being collected includes the registrant/user's first and last name, e-mail address, User ID number, username, street address, degree, certificate type, gender, age, race/ethnicity, practice setting, level of seniority, primary role, years in profession, notification information, current and future contact information. The provision of data concerning the registrant's gender and race are optional.

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

The implementation of the TCH website program reduces the burden on registrants/users of the website for acquiring necessary, current, and updated information from disparate locations. The website allows registrants/users to login and receive information that would otherwise have to be retrieved through other more burdensome means such as standard mail, telephone, or facsimile. In turn, registrants/users have immediate access to information upon completion of the website registration form that is designed to collect all necessary information while minimizing registrant/user burden.

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

Based on the nature of the TCH website, the registration form requires the collection of specific information; registrant's name, email address, User ID number, street address, degree, certificate type, gender, age, ethnicity, race, practice setting, level of seniority, primary role and years in profession, notification information, and future contact information to allow for the creation of registrant/user specific accounts. Collection of this type of information has been used for websites and services to verify that the site is used by a variety of health professionals representing different disciplines, skill sets, and demographic locations, as required for HHS/OS/OMH to comply with the cultural competency requirements of the ACA. The provision of data concerning the registrant's gender and race are optional. Additionally, information such as practice setting, years in their respective profession and address are necessary for training accreditation purposes.

In the future, registrants/users may be asked to voluntarily answer survey questions as part of the registration process. This voluntary survey will allow the registrant/user to submit generic information that can be used for evaluation and assessment purposes to determine who, how, and where the TCH programs are being implemented.

Currently, there is no existing repository of this information that can be leveraged to complete the forms on behalf of the registrants/users of the TCH website.

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

HHS recognizes dentists and physicians as small business entities. In an effort to reduce the burden on these health professionals and/or small business entities, the information being collected has been kept at the minimum required to achieve the intended purpose of the TCH website.

## **6. Consequences of Collecting the Information Less Frequent Collection**

There are no legal obstacles that would prevent the reduction of burden on the registrant/user. The TCH website requires that registrants/users submit their information only once as part of the initial registration process. No data is collected periodically. There are no increases of the burden on registrants/users.

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

There are no special circumstances that would result in data collection outside of this process.

## **8. Comments in Response to the Federal Register Notice/Outside Consultation**

A 60-day Federal Register Notice was not published for this system. This system is being reviewed per the process as described in OMB M-11-26, *New Fast-Track Process for Collecting Service Delivery Feedback under the Paperwork Reduction Act*, based on the following criteria:

- a) The data collection is focused on the awareness, understanding, attitudes, preferences, or experiences of customers or other stakeholders (e.g., delivery partners, co-regulators, potential customers) in order to improve existing or future services, products, or communication materials;
- b) The data collection is voluntary and non-controversial;
- c) Statistical rigor is not required;
- d) The burden on participants is not high; and
- e) Public dissemination of results is not intended.

As required by the Privacy Act (5 U.S.C. § 552a) (**Attachment C**), because some of the information being collected from users is personally identifiable information (PII) that will be retrieved by name or other personal identifier, a System of Records Notice (SORN) is being submitted to OMB for review concurrently with submission of this Supporting Statement. The TCH SORN, in addition to published website policies, will provide public notification as to the purposes for which information being collected will be used, disclosed, and retained.

**9. Explanation of any Payment/Gift to Respondents**

No payments or gifts are provided to registrants/users.

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

Information being collected is voluntarily provided by registrants/users. Access to the information is limited to agency contractors, consultants, or HHS grantees. Access is granted via role-based responsibilities. The system is password protected, encrypted, and the operating system is secure.

**11. Justification for Sensitive Questions**

The purpose of the system is to allow registrants/users to register and create unique profiles to monitor information, such as training records. To accomplish this, it is necessary to collect specific types of PII such as first and last name, age, race/ethnicity, and gender to reduce the likelihood that a single record could be mistaken for any other individual than that which it is intended. To reduce the burden on registrants/users, the collection of PII is limited to the minimum required to provide reasonable and confident identification of a single registrant/user.

**12. Estimates of Annualized Hour and Cost Burden**

The types of respondents for this collection are health professionals where each respondent registers as a single registrant/user. There are no requirements for annual responses. A single registrant/user completes the registration process only one time.

On average, it took three minutes for a registrant/user to complete the online registration form. This was conducted using a small sample of five people that were not familiar with the form.

**12A. Estimated Annualized Burden Hours**

<b>Form Name</b>	<b>Type of Respondent</b>	<b>No. of Respondent</b>	<b>No. Responses per Respondent</b>	<b>Average Burden per Response (hours)</b>	<b>Total Burden (hours)</b>
Think Cultural Health Registration Form	Physician	27477	1	3/60	1,373.85
	Nurse	44723	1	3/60	2,236.15
	Physician Assistant	1882	1	3/60	94.10
	Dentist	377	1	3/60	18.85
	Dental Professional	39	1	3/60	1.95
	Social Worker	1733	1	3/60	86.65
	Public Health	186	1	3/60	9.30
	General Healthcare	12635	1	3/60	631.75

Worker				
Psychologist/Psychiatrist	189	1	3/60	9.45
Mental Health Professional	180	1	3/60	9.00
Pharmacist, RPH	750	1	3/60	37.50
Emergency Medical Technician	492	1	3/60	24.60
Administrator or Hospital Executive	151	1	3/60	7.55
Policymaker or Public Official	17	1	3/60	0.85
Teacher	424	1	3/60	21.20
Lawyer	107	1	3/60	5.35
Bachelors	3753	1	3/60	187.65
Masters	4063	1	3/60	203.15
Doctorate	1130	1	3/60	56.50
Student	7504	1	3/60	375.20
Other	10880	1	3/60	544.00
<b>TOTAL</b>	118692	1	3/60	5,934.60

**12B.**

This is not an annual collection. This is a one-time collection used for registration purposes on the TCH website. Though there are no annual burden costs to registrants/users, a one-time cost can be calculated.

The TCH website does not collect salary information pertaining to registrants/users as part of the data collection; therefore, figures were based on statistics provided by the Department of Labor. Using the latter, it was determined that the national average hourly wage for the types of respondents/users of the TCH website ranges from \$16.01 to \$81.05. This information was used to equate to an average \$43.92 per hour for registrants/users. The average registrant/user is expected to complete each form in 0.05 hours, thus making the cost of burden  $\$43.92 \times 0.05 \text{ hours} = \$2.20$  a one-time total registrant/user cost burden per form.

Type of Respondent	Total Burden (hours)	Hourly Wage Rate	Total Respondent Costs
Physician	1,373.85	\$81.05	\$111,346.42
Nurse	2,236.15	\$26.22	\$58,631.85
Physician Assistant	94.10	\$41.89	\$3,941.85
Dentist	18.85	\$84.13	\$1,585.89
Dental Professional	1.95	\$22.56	\$44.00
Social Worker	86.65	\$22.50	\$1,949.41

Public Health	9.30	Not available	Not available
General Healthcare Worker	631.75	\$25.28	\$15,970.64
Psychologist/Psychiatrist	9.45	\$80.58	\$761.48
Mental Health Professional	9.00	\$19.88	\$178.92
Pharmacist, RPH	37.50	\$52.59	\$1,972.13
Emergency Medical Technician	24.60	\$16.01	\$393.85
Administrator or Hospital Executive	7.55	\$45.03	\$339.98
Policymaker or Public Official	0.85	Not available	Not available
Teacher	21.20	\$34.92	\$740.30
Lawyer	5.35	\$62.23	\$332.93
Bachelors	187.65	Not available	Not available
Masters	203.15	Not available	Not available
Doctorate	56.50	Not available	Not available
Student	375.20	Not available	Not available
Other	544.00	Not available	Not available
<b>TOTAL</b>	5,934.60	614.87	198,189.64

**13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

There is no burden of cost to registrants/users as the collection participation is voluntary and free to registrants/users. HHS assumes the burden of cost pertaining to the maintenance and acquisition of necessary equipment (i.e. computer hardware and software) associated with the collection.

**14. Annualized Cost to Federal Government**

An estimated \$6,000 was spent for initial development and operational start-up costs to launch the TCH website. Three technical staff, whose hourly salaries ranged from \$17.00 to \$30.00, completed start-up activities. Approximately 250 hours of staff time was devoted to completing all website start-up activities. While there is no daily, active review and evaluation of website data collection, it is estimated that annual operation and oversight of the TCH website involves three technical staff, whose hourly salaries range from \$20.00 to \$30.00. Approximately 200 hours of staff time is required annually to operate and maintain the website. At an average of \$25 per hour, the annual cost to the Federal Government of operating and maintaining the TCH website is approximately \$5,000.

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

This is a new submission. Therefore, there are no changes or adjustments.

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

The information being collected will not be used for tabulation and publication. It is used for the sole purpose of creating registrant/user accounts within the system. The time schedule of collection will be indefinite depending on the life of the system.

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

Not applicable.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.

**B. Collection of Information Employing Statistical Methods**

The information collection is a voluntary process for registrants/users registering on the TCH website to receive a newsletter and to complete training.

For this collection, item 17 on OMB 83-1 form is “No.” Therefore, section B of the supporting statement is not applicable.

**Attachments to the Supporting Statement**

- A. Patient Protection and Affordable Care Act of 2010 (ACA) (P.L.111-148)
- B. TCH Online Registration Form
- C. Privacy Act (5 U.S.C. § 552a)