

Supporting Statement A

Revision

NCHS Vital Statistics Training Application

OMB No. 0920-0217

(Expiration date: 05-31-2013)

Contact Information:

Julia L. Kowaleski

Chief, Registration Methods Program

Division of Vital Statistics

National Center for Health Statistics/CDC

3311 Toledo Road, Room 7317

Hyattsville, MD 20782

301-458-4323

FAX: 301-458-4034

[JKowaleski@cdc.gov](mailto:JKowaleski@cdc.gov)

March 8, 2013

## SECTION A TABLE OF CONTENTS

<b>SECTION</b>	<b>PAGE</b>
A. Justification.....	4
1. Circumstances Making The Collection Of Information Necessary.....	4
2. Purpose And Use Of The Information Collection.....	6
3. Use Of Information Technology And Burden Reduction.....	7
4. Efforts To Identify Duplication And Use Of Similar Information.....	7
5. Impact On Small Businesses Or Other Small Entities.....	7
6. Consequences Of Collecting The Information Less Frequently.....	7
7. Special Circumstances Relating To The Guidelines For 5CFR1320.5.....	7
8. Comments In Response To The Federal Register Notice And Efforts To Consult Outside The Agency.....	7
a. Federal Register Notice.....	7
b. Outside Consultation.....	8
9. Explanation Of Any Payment Or Gifts To Respondents.....	8
10. Assurance Of Confidentiality Provided To Respondents.....	8
11. Justifications For Sensitive Questions.....	9
12. Estimates of Annualized Burden Hours and Costs.....	9
13. Estimate Of Other Total Annual Cost Burden To Respondents Or Record Keepers.....	10
14. Annualized Cost To The Federal Government.....	10
15. Explanation For Program Changes Or Adjustments.....	10
16. Plans For Tabulation And Publication And Project Time Schedule.....	11
17. Reason(S) Display Of OMB Expiration Date Is Inappropriate.....	11

18. Exceptions to Certification for Paperwork Reduction Act Submissions..... 11

Attachments

- A. Legislative Authority to Collect Data; 42 U.S.C. 242k, Section 304 (b)(1) and Section 306 (h)(1)
- B. Application for Mortality Coding Training
- C. Application for Vital Statistics Training
- D. Sample Letter Announcing Specific Training Courses
- E. Copy of Federal Register 60-Day Notice
- F. IRB (ERB) Statement - ERB Approval is not Required
- G. OMB Comment and response

## **SUPPORTING STATEMENT**

### **NCHS VITAL STATISTICS TRAINING APPLICATION**

This is a request for a revision of the NCHS Vital Statistics Training Application (OMB No. 0920-0217, expires May 31, 2013), conducted by the National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention. A three-year clearance for the forms is requested. Changes include:

- Deletion of the survey of anticipated needs;
- Addition of a second application for training form.

#### **A. Justification**

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

The compilation of national vital statistics by the federal government dates back to the beginning of the 20<sup>th</sup> century. In July 1946, the President's Reorganization Plan No. 2 transferred this function from the U.S. Bureau of the Census to the Federal Security Administrator. It was subsequently transferred to the Secretary of the Department of Health, Education, and Welfare, which was later renamed the Department of Health and Human Services (DHHS). To administer these functions, the National Office of Vital Statistics (NOVS) was established in the Public Health Service in April 1953. In August of 1960, the NOVS was reorganized as the Division of Vital Statistics in the newly created National Center for Health Statistics (NCHS), which is now part of the Centers for Disease Control and Prevention (CDC), DHHS.

One of the functions of the NCHS is to plan and administer a program, called the National Vital Statistics System (NVSS), to collect, process, and disseminate national statistics on births, deaths, and fetal deaths and summary statistics on marriages and divorces reported to NCHS by the state vital registration jurisdictions. This includes promoting the uniform collection of data on these events and providing technical assistance to the registration jurisdictions; preparing life tables and analyses of life table phenomena; and investigating the quality and reliability of data and methodology. The collection of data is authorized by 42 USC 242k, Section 306 (h) (1) of the Public Health Services Act in Attachment A.

Since 1902, when the Federal Government first became actively involved in the development and promotion of state vital statistics programs, many programs have been employed in an effort to bring about more uniformity and a higher degree of quality in

data collection and dissemination through these state programs. Such uniformity of quality is essential if the data from the individual states are to be aggregated at the national level to produce reliable national vital statistics data. The programs offered by the Federal Government have included the development and funding of quality control and registration promotion programs; they have also included training programs for persons involved in various aspects of the vital registration and vital statistics systems at the local, state and national levels. This technical assistance is provided currently by NCHS under the legislative authorization of 42 USC 242b (Section 304(b)(1) of the Public Health Service Act), which states that the "Secretary may utilize personnel and equipment, facilities and other physical resources of the Department of Health and Human Services...to...provide technical assistance and advice...." Attachment A contains the full text of this legislation. All of this is in support of the annual collection of data from the records of births, deaths and fetal deaths and summary statistics on marriages and divorces in registration areas, which is to be done "...only from and restricted to such records of the States and municipalities which...possess records affording satisfactory data in necessary detail and form." as mandated by Section 306(h) of the Public Health Service Act.

#### Privacy Impact Assessment

The information required for the Privacy Impact Assessment is presented in the sections below.

#### Overview of the Data Collection System

There are two application forms, one relates to courses in general vital statistics areas (Attachment B) and the second refers to courses in mortality medical coding (Attachment C). The form is to be completed by each individual who wishes to receive the training. If this information is not obtained, course instructors will not be able to schedule and plan their courses to meet the existing needs of state and local personnel. This application for training is usually sent with a course announcement, such as in Attachment D.

#### Items of Information to be Collected

From the Vital Statistics Administrator:

1. Number of staff who might need specific training

From those seeking training:

1. Course Names
2. Name and Signature

3. Organization Name and Address
4. Office Phone Number
5. E-mail Address
6. Occupation
7. Brief Description of Present Job
8. Number of Years in Position

#### Information in Identifiable Form (IIF)

The list of requested items considered to be sensitive includes the following on the application for training:

1. Name and Signature
2. Organization Name and Address
3. Office Phone Number
4. E-mail Address
5. Occupation
6. Brief Description of Present Job

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

There is no website directed at children under 13 years of age.

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

NCHS assists in achieving the comparability needed for combining data from all States into national statistics, by conducting a training program for State and local vital statistics staff to assist in developing expertise in all aspects of vital registration and vital statistics. The training offered under this program includes courses for registration staff, statisticians, and coding specialists, all designed to bring about a high degree of uniformity and quality in the data provided by the States. NCHS notifies State and local vital registration officials, as well as Canadian counterparts, about upcoming training. Individual candidates for training then submit an application form including name, address, occupation, and other relevant information. It was felt that the needs for various topics were known through meetings, so the annual survey of training needs has been discontinued.

#### Privacy Impact Assessment Information

There are two application forms, one relates to courses in general vital statistics areas (Attachment B) and the second refers to courses in mortality medical coding (Attachment C). The form is to be completed by each individual who wishes to receive the training. If this information is not obtained, course instructors will not be able to schedule and plan their courses to meet the existing needs of state and local personnel. Applicants are

informed that personal information may be shared in confidence with the course instructor to ensure that the correct training is provided.

Information obtained will be processed manually and stored in file cabinets, access to which will be limited to NCHS staff involved with the development and presentation of the training programs. The information concerning applicants will be treated as confidential and will not be shared with other organizations or persons (except instructors). No sensitive information is collected and there is no effect on an applicant's privacy. On an annual basis the information will be obsolete and will be destroyed.

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

Respondent burden in this collection will be kept to a minimum, and there are no technical or legal obstacles to burden reduction. Course announcements will also be transmitted by e-mail, with the training application form either imbedded in the message or transmitted as an attachment. Applicants for training will preferably submit the completed form to NCHS by fax, because NCHS requires that both the applicant and his/her supervisor sign the application. This is done to confirm that the applicant's sponsoring institution is aware of its responsibility for the travel costs of the trainee.

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

No comparable training or information about needs for the training exists. NCHS, which is the locus of the World Health Organization Collaborating Center for Classification of Disease in North America, one of six such centers in the world, is the only U.S. source for mortality coder training.

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

No small businesses will be involved in this data collection.

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

Information is only collected when a person requests taking a course.

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

In the event that a respondent desired to attend more than one course, it would be necessary to complete a second training application.

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

A. A 60-day notice (Attachment E) was published in the Federal Register, Volume 77, No. 199, pp. 62517-18, on October 15, 2012. One comment was received (Att. G).

B. Consultation on the application form has not been deemed necessary. These forms will be used only to identify the need for training and to obtain the minimum amount of information needed by course instructors to determine the relevant background of applicants.

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

There are no payments to respondents. Moreover, training is provided to trainees without charge for tuition or training costs. Trainees or their sponsoring agencies are responsible only for their travel and per-diem costs to the training site.

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

This submission has been reviewed by the NCHS Privacy Act Liaison who determined that the Privacy Act does apply. The Privacy Act System of Records for this project is 09-20-0163 - Applicants for NCHS Technical Assistance.

The following statement about the confidentiality of information is provided on the application form just above the place for the applicant's signature:

Section 304(b)(1) of the PHS Act (42 USC 242b) authorizes the DHHS Secretary to provide technical assistance in matters relating to health statistical activities. The principal purpose of the information requested in this form is to select students for training. All information which would permit identification of any individual, a practice, or an establishment will be held confidential, will be used only by NCHS staff, contractors, and agents only when required and with necessary controls, and will not be disclosed or released to other persons without the consent of the individual or the establishment in accordance with section 308(d) of the Public Health Service Act (42 USC 242m). Provision of the requested information is voluntary; however, failure to supply all information may delay or prevent action on your application.

Applicants are told that their information may be shared with course instructors to assist in planning the class.

An assurance of confidentiality is provided to all respondents according to Section 308(d) of the Public Health Service Act (42 USC 242m) which states:

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...304,...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 ... in the case of information obtained in the course of health statistical or epidemiological activities under section...304, 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,....

#### Privacy Impact Assessment Information

- A. The Privacy Act System of Records for this project is 09-20-0163 - Applicants for NCHS Technical Assistance.
- B. Information obtained will be processed manually and stored in file cabinets, access to which will be limited to NCHS staff involved with the development and presentation of the training programs. The information concerning applicants will be treated as confidential and will not be shared with other organizations or persons. On an annual basis the information will be obsolete and will be destroyed. Project is subject to the NCHS assurance of confidentiality (Section 308(d) of the Public Health Service Act
- C. The NCHS Ethics Review Board (ERB) has found that the project described in these documents does not meet the regulatory definition of research. Therefore, ERB approval is not required. (See Attachment F)
- D. The Application for Training (Attachments B and C) indicates that “this information may be disclosed in confidence to instructors. Provision of the requested information is voluntary; however, failure to supply all information may delay or prevent action on your application.”

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

There are no sensitive questions on these documents.

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

There is no cost to individual respondents other than their time to complete the forms.

It is estimated that each applicant will require 15 minutes to complete the individual application form. An individual would be unlikely to apply for more than one course per year.

Based on previous experience, the resultant expected annual respondent burden (30 hours) is thus estimated as follows:

Average Annual Burden

Type of Respondent	Form Name	Number of respondents	Number of responses per respondent	Average burden per response (in hours)	Total burden hours
State, Local health department and Canadian vital health employees	Application for Mortality coding Training	60	1	15/60	15
State, Local health department and Canadian vital health employees	Application for Vital Statistics Training	60	1	15/60	15
<b>Total</b>					<b>30</b>

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

There are no additional costs to respondents resulting from completing the application for training form.

**14. Annualized Cost to the Government**

The annualized Federal costs for duplicating, mailing, and reviewing these documents is estimated to be approximately \$10,000 per year. This is based on previous experience.

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

The previous burden was 44 hours. The burden has been reduced by 14 hours to 30 hours burden, primarily due to the discontinuation of the annual survey of course needs.

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

This project will not produce results to be published for statistical use. However, the overall time schedule is as follows: On an annual or as needed, a schedule will be developed and provided to state and local governments and to Canadian locations. Sessions will be given as interest and needs dictate. Applications from individual applicants will be accepted until approximately 2 weeks before each session.

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

The display of the OMB expiration date is not inappropriate.

#### **18. Exceptions to Certificate for Paperwork Reduction Act Submissions**

There are no exceptions to the certification