

Supporting Statement A for Paperwork Reduction Act Submission for

Reinstatement No Change

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

OMB No. 0920-0912, expired 1/31/2013

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LIST OF ATTACHMENTS

Attachment A: NCHS Legislation – Section 306 of the Public Health Services Act (42 USC 242k)

Attachment B: Semi-Structured Telephone Protocol

Attachment C.1: Advance Package-Contact Information Verification

Attachment C.2: Advance Package-NCHS' Cover Letter

Attachment C.3: Advance Package-NCHS' Confidentiality Brochure

Attachment D: Electronic File Development

Attachment E: Federal Register Notice

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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 Center for Disease Control and Prevention's (CDC's) National Center for Health Statistics (NCHS) seeks approval to collect data needed to develop up-to-date sampling frames of state-regulated residential care facilities in the United States. This is a reinstatement no change for OMB No. 0920-0912, expired 1/31/2013. The sampling frames will be used (1) to draw a nationally representative sample for the residential care facility components of the 2014 and 2016 National Study of Long-Term Care Providers (NSLTCP), and (2) to produce state-level summary estimates of residential care facilities. A three year clearance is requested for frame development.

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.

NSLTCP obtains and provides statistical information about paid, regulated long-term care (LTC) providers in the United States (OMB No. 0920-0943. Exp. Date: 07/31/2015), 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 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 using 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 includes 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.

Residential care frame development for the first wave of NSLTCP was approved and fielded in 2012. NCHS now seeks to reinstate this approval for new data collection. Data collection in 2013 and 2015 will provide up-to-date frame information for the 2014 and 2016 residential care facility survey components of NSLTCP. The NSLTCP study definition of a residential care facility is one that is licensed, registered, listed, certified, or otherwise regulated by the state to provide room and board with at least two meals a day, provide around-the-clock on-site supervision, and help 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.

Approval to build an adult day services center frame is not being sought. As was done in 2012, NCHS will be purchasing the adult day services center frame from the National Adult Day Services Association (NADSA).

Privacy Impact Assessment

Facility directors' names and contact information will be collected. These are considered data already available in the public domain (e.g. websites or telephone directories). No other 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 2013 and 2015. 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 will also ask the state government representatives about their willingness, in the future, to provide a letter of support for NSLTCP and to help with outreach to providers to encourage survey participation during NSLTCP survey data collection. We estimate verification of contact information (Attachment C.1), response to a semi-structured telephone protocol (Attachment B), and development of the facility listing in an electronic format (Attachment D) will take approximately 2.5 hours 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; and bed size. We will collect information on type of facility ownership and type of residents served (i.e. Alzheimer's/dementia, developmentally disabled), where available. We will collect information to help us determine the frequency with which owners change and to determine whether the facility is part of a national or regional chain.

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

The collected data will enable NCHS to 1) determine which providers should be in the sampling frames for the residential care facility survey components of the 2014 and 2016 NSLTCP; 2) inform the sampling design; 3) select a sample of residential care facilities for those components of the NSLTCP that is both nationally representative and enables representative state-level estimates where feasible; 4) conduct nonresponse bias analysis for the 2014 and 2016 surveys; and 5) determine the amount of turnover in this sector (business entries and exits), which will inform how frequently to produce up-to-date frames for future surveys.

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 licensing agency websites and talk by telephone with representatives in all states and the District of Columbia (Attachment B). State government representatives will be asked to provide an electronic file listing state-regulated residential care facilities. In many cases the state government representatives will need to work with others in their departments to provide supplemental information not normally captured in their online listings. We estimate verification of contact information (Attachment C.1), response to a semi-structured telephone protocol (Attachment B), and development of a facility listing in an electronic format (Attachment D) will take approximately 2.5 hours per state.

Privacy Impact Assessment Information

NCHS will use the collected data to determine which providers should be used in the sampling frames for the residential care facility survey components of the 2014 and 2016 NSLTCP. The frame data will be used to inform the NSLTCP sampling design and to select a nationally representative sample of residential care facilities. NCHS will also use the data to produce and release state-level summary residential care facility estimates where feasible. NCHS will use the frame data to conduct nonresponse bias analyses for the 2014 and 2016 surveys. Frame data will be used to determine the amount of turnover in this sector, which will inform how frequently to produce up-to-date frames for future surveys.

No IIF is being collected.

3. Use of Improved Information Technology and Burden Reduction

An encrypted SAS dataset of the states' residential care facilities will be sent to NCHS via mail or 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 in 2014 and 2016. 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 NSLTCP in 2012 (OMB No. 0920-0912, expiration 01/31/2013) and used for the 2012 survey (OMB No. 0920-0943, Exp. Date: 07/31/2015); given turnover of establishments in this sector, NCHS concludes that the 2012 frame is too old for use in a 2014 survey. To create the up-to-date frame of state-regulated residential care facilities, NCHS shall employ the approach and methodology used for the 2012 collection.

5. Impact on Small Businesses or Other Small Entities

No small businesses are affected.

6. Consequences of Collecting the Information Less Frequently

There is a high level of turnover of establishments in this sector; thus a biennial collection is needed to provide the best 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. 78, No. 59, pages 18599-

18600, March 27, 2013 (Attachment E). No comments were received.

- B. Efforts we have made to consult outside the agency include:
- consulted with the contractor that developed the frame for the 2012 NSLTCP
 - read the report by the contractor that described the frame development for the 2012 NSLTCP

9. Explanation of Any Payments or Gifts to Respondents

There will be no payments, gifts, or incentives.

10. Assurance of Confidentiality Provided to Respondents

This submission has been reviewed by the NCHS Privacy Act Liaison. It has been determined that the Privacy Act does not apply. No IIF is being collected.

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 Liaison. 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 e-mailed in advance to state government representatives (Attachments C.2-3). The NCHS cover letter 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. As with the 2012 frame development, these data collection efforts are deemed not human subjects research (Attachment F).
- 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 three year clearance. Fifty states and the District of Columbia will be surveyed in 2013 and 2015. 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 88 hours based on two data collections during the three year clearance period.

Table 1: Estimated Annualized Burden Hours

Type of Respondent	Form Name	Number of Respondents	Number of Responses/ Respondent	Average Burden/ Response (in hours)	Response Burden in Hours
State Government Representatives	Contact info verification	34	1	5/60	3
State Government Representatives	Telephone protocol	34	1	30/60	17
State Government Representatives	Electronic file development	34	1	2	68
Total					88

B. Cost to Respondents

The only cost to respondents is their time. The estimated annualized cost for data collection for the frame development is \$2,678 (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	88	\$30.43 ¹	\$2,678
Total	\$2,678		
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/oes119151.htm			

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	\$48,000
Frame Development (Contractor)	Field staff costs, including data collection costs and other direct costs	\$140,000
Estimated Total Cost		\$188,000

15. Explanation for Program Changes or Adjustments

This is a reinstatement. The previous approval was for a one year data collection at 132 hours of burden. This request is for two collections over three years. The average annual burden is 88 hours, a reduction of 44 hours.

16. Plans for Tabulation and Publications and Project Time Schedule

OMB clearance is requested for a period of three years. Data collection for the 2013 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 same process will be repeated in 2015. Major milestones and the corresponding due dates are shown in Exhibit 2. The sampling frames constructed will be used for the residential care survey components of the 2014 and 2016 NSLTCP. However, the frame development (i.e., information on individual facilities) is confidential and no public use file containing frame data is anticipated.

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
Email 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
Drawing of NSLTCP sample	8-10 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.