

Effective Educational Campaigns for Private Well Owners

OSTLTS Generic Information Collection Request
OMB No. 0920-0879

Supporting Statement – Section A

Submitted: May 12, 2014

Program Official/Project Officer

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Section A – Justification

1. Circumstances Making the Collection of Information Necessary

Background

This data collection is being conducted using the Generic Information Collection mechanism of the OSTLTS OMB Clearance Center (O2C2) – OMB No. 0920-0879. The data collection clearance request is for one year. Data will be collected across all 50 states from 100 environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners. This data collection is authorized by Section 301 of the Public Health Service Act (42 U.S.C. 241).

As a drinking water source, groundwater may be generally safe, but there are many instances where groundwater or a drinking water well have been contaminated from anthropogenic sources^{1,2,3,4}, where contaminants exist naturally in groundwater and can cause adverse health effects^{5,6}, or where a well has been compromised allowing contaminants to enter the well⁷. Private well owners have historically assumed that their well water is safe to drink^{8,9}. This happens for various reasons, including a long history of using the well, the assumption that groundwater is a protected resource, or that being in a rural setting protects their drinking water source, to name a few⁸. Because of these and other reasons that are not well understood, well owners don't typically test their well water, even when efforts to promote testing or to provide testing have been undertaken.

There is a great need among environmental health staff at state, local, and tribal environmental health and agricultural departments who conduct outreach to private well owners to 1) better understand the motivations for testing private wells and 2) what methods might be most effective at encouraging private well owners to test their well water. Well owners tend to be complacent and perceive their well water to be safe, or they lack awareness of the issues associated with private well water quality^{8,11,12}. In other cases, well owners assume they can't afford to test their well water or procrastinate because of the fear of costs, findings, or they don't understand a threat actually exists^{8,12,13}. There have been many state, local, and tribal outreach programs conducted by environmental health staff to educate the owners of private wells about the risks involved with well water¹⁰. In most cases, information on the success of these programs is not available. They are often local in scope and the results of their efforts are not published. Because of this, the success of many of these programs is unknown, except to the environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners who conducted the program.

To this end, The University of Illinois (UI) was successful in securing a contract from CDC to identify and assess effective educational campaigns for private well owners. The goal of the project is to identify the types—and provide examples of—educational campaigns that are most effective at getting homeowners to regularly test their wells. The UI has developed a successful online class for well owners, The Private Well Class, to educate well owners about the responsibilities of owning

and using a private well. Through that effort, the UI has developed a database of state, local, and tribal environmental health and agricultural departments. The UI will solicit input from environmental health staff at these departments who are government officials and who conduct outreach to private well owners via an online information collection. The UI will use the data from this information collection to understand what factors influenced success at engaging private well owners.

This information collection is necessary to better understand what methods have been used to encourage well testing and what success has been achieved. The goal is to determine the most effective and successful approaches that have been used by environmental health and agricultural departments to increase well owner testing. The results of this information collection will be presented in a written report. These results can then be shared among all environmental health staff at state, local, and tribal environmental health and agricultural departments and used in future private well owner outreach programs to increase well owner participation and awareness of the need for testing their well water.

Privacy Impact Assessment

Overview of the Data Collection System – The data collection system consists of a web-based information collection instrument (**MS Word version - Attachment A, web version - Attachment B**) designed to elicit information from environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners. The data will be collected using Survey Monkey ®. The online information collection instrument has been pilot tested by four UI staff. The results were used to refine the questions and establish the estimated time for completing the instrument as 18 minutes per response.

Items of Information to be Collected

The data collection consists of 24 - 28 items, depending on how answers are chosen, because some have multiple parts. These items cover information about the respondent's program, including number of well owners who participated, partners, funding, and resources involved. They also cover factors that influence how the program was completed, such as advertising methods, program scale, location, type of program, and how material/information were delivered to well owners. Thirteen questions require the respondent to choose one answer from up to five response options. Five questions require the respondent to choose one or more choices from up to nine options. There are 3 questions requiring a narrative response that allow the respondent to provide an assessment of specific results from their program, and there are 3 questions that require a short, single answer.

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

The data collection system involves using a web-based collection instrument. Respondents will be sent a link directing them to the online instrument only (i.e., not a website). No website content will be directed at children.

2. Purpose and Use of the Information Collection

The primary purpose of this data collection is to assess how environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners interact with their potential participants to understand what approaches and methods are most successful at encouraging participation. Many state, local, and tribal environmental health and agricultural departments around the country offer support to private well owners, but most are managed at a local or state scale and there is little cross-department interaction or sharing of approaches that would provide environmental health staff who are government employees and who conduct outreach to private well owners with suggestions on how to increase well owner participation. By collecting this data, successful outreach in the field can be identified and categorized. The results of this data collection will be used by environmental health staff to increase the number of well owners who test their wells.

This data collection and analysis of the data will have several uses. The first is to provide a set of methods and approaches that environmental health staff who conduct future private well owner outreach can consider. The second is to provide an assessment of each method or approach to summarize when each has been most successful and in what situations each should be considered. The third is to provide CDC staff at the National Center for Environmental Health who are assessing well owner attitudes, with approaches and methods that can be tested and compared to further the science of behavioral outcomes based on environmental health risks. Additionally, a final report will be disseminated nationally to a broader stakeholder group of those interested in environmental health.

Privacy Impact Assessment

The data supplied by the participants, as well as the data identifying participants, will be maintained on secure computers behind the University of Illinois firewall. Data will be password protected so that only authorized users will have access to the data collected.

The scope of data collection is limited to outreach program logistics, results, and opinions of environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners. Any personally identifiable information will be kept secure, and will not be provided in the report. Details of the report and other plans to disseminate the final results from this work are described in section 16 of this document.

3. Use of Improved Information Technology and Burden Reduction

Data will be collected via a web-based tool, Survey Monkey®. This will allow respondents to complete and submit their responses electronically. This method was chosen to reduce the overall burden on respondents. The questions will use easy to read and understand response scales, check boxes, or text boxes. The data collection instrument was designed to collect the minimum

information necessary for the purposes of this project. Participants will be asked to provide details of their programs, as well as their opinions on the several aspects of their program.

Survey Monkey ® has a data center located in a SAS70 Type II certified facility. The facility is staffed and under surveillance 24/7. The servers are in a locked cage, with digital surveillance equipment monitoring at the data center. Secure Sockets Layer (SSL) technology protects user information using both server authentication and data encryption, ensuring that data is safe, secure and available only to authorized persons in a password protected system. Personally identified information will not be collected.

4. Efforts to Identify Duplication and Use of Similar Information

There has not been a systematic assessment of methods and approaches used by environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners. Available data has looked at options to increase participation of well owners in testing, but these have been very limited in scope or have focused directly on the well owners themselves. Unless data are collected from many environmental health and agricultural departments' outreach programs in multiple areas with differing environmental issues, these data will not provide the breadth of possible methods in use to adequately assess how and why specific approaches may increase participation in some cases and not in others. Well owners are likely motivated in different ways. This data collection will provide information from many individual programs that when looked at together may explain when and where a specific approach will likely be most effective at increasing participation. It also gives the program directors the opportunity to provide insight from their own experiences that can supplement the quantitative data. This is a unique and needed data collection, which does not currently exist. It will provide environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners with assistance in increasing well owner participation in their own programs.

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

Without this data, an assessment of methods to increase well owner participation and how best to implement those methods would not be possible. The results of this effort will inform environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners nationally on best practices they can implement to increase the effectiveness of their well owner outreach and testing activities.

This request is for a one time data collection. There are no legal obstacles to reduce the burden.

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

There are no special circumstances with this information collection package. This request fully complies with the regulation 5 CFR 1320.5 and will be voluntary.

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

This data collection is being conducted using the Generic Information Collection mechanism of the OSTLTS OMB Clearance Center (O2C2) – OMB No. 0920-0879. A 60-day Federal Register Notice was published in the Federal Register on October 31, 2013, Vol. 78, No. 211; pp. 653 25-26. No comments were received.

CDC partners with professional STLT organizations, such as the Association of State and Territorial Health Officials (ASTHO), the National Association of County and City Health Officials (NACCHO), and the National Association of Local Boards of Health (NALBOH) along with the National Center for Health Statistics (NCHS) to ensure that the collection requests under individual ICs are not in conflict with collections they have or will have in the field within the same timeframe.

9. Explanation of Any Payment or Gift to Respondents

CDC will not provide payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

The Privacy Act does not apply to this data collection. Employees of state and local public health agencies will be speaking from their official roles and will not be asked, nor will they provide individually identifiable information. This data collection is not research involving human subjects.

11. Justification for Sensitive Questions

No information will be collected that are of personal or sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The estimate for burden hours is based on a pilot test of the data collection instrument by four members of the Private Well Class staff. In the pilot test, the average time to complete the questions, including time for reviewing instructions, gathering needed information and completing the data collection, was 15 minutes, with a range of 12-20 minutes. Our estimate for the total burden, including additional time to review the email requesting participation, is 18 minutes.

Estimates for the average hourly wage for respondents are based on the Department of Labor (DOL) National Compensation Survey estimate for management occupations – medical and health services managers in state government (<http://www.bls.gov/ncs/ocs/sp/nctb1349.pdf>). Based on DOL data, an average hourly wage of \$32.62 is estimated for all 100 respondents. Table A-12 shows estimated burden and cost information.

Table A-12: Estimated Annualized Burden Hours and Costs to Respondents

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Environmental health staff at state, local, and tribal environmental health and agricultural departments	100	1	18/60	30	\$32.62	\$978.60
TOTALS	100	1		30		\$978.60

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

There will be no direct costs to the respondents other than their time to participate.

14. Annualized Cost to the Government

There are no equipment or overhead costs. A contract with the University of Illinois is in place and will be used to oversee all aspects of the data collection and analysis. There will be no additional cost to the government for the contractor beyond or above what is listed in the Statement of Work. The web page development, instrument design, data analysis and reporting will be implemented by the University of Illinois and will be overseen by CDC.

The costs to the government include the cost of the contract, the CDC Technical Monitor and the CDC Project Officer. The CDC Technical Monitor and the Project Officer will oversee the tasks and deliverables of the contract. The estimated costs reflect the costs outlined in the Statement of Work and 220 hours of a CDC FTE GS-13 and a GS-14 for oversight of the data collection development and analysis. The estimated cost to the federal government is \$192,444. Table A-14 describes how this cost estimate was calculated.

Table A-14: Estimated Annualized Cost to the Federal Government

Staff (FTE)	Average Hours per Collection	Average Hourly Rate	Average Cost
Technical Monitor-CDC GS-14	120	\$62.00	\$7,440.00
Project Officer-CDC GS-13	120	\$52.00	\$6,240.00

UI Contract			\$178,764.00
Estimated Total Cost of Information Collection			\$192,444

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

Quantitative analyses will involve using descriptive statistics to determine frequency distributions and corresponding variances for responses to the relevant questions. Responses will be cross-tabulated to compare independent variable responses including advertising methods, incentives to participate, number and type of partners/stakeholders, reasons for conducting program, type of program, and program scale. Both factor analysis and coding analysis will be used to assess the data. Qualitative thematic analyses will be performed on open-ended, descriptive questions to compile recommendations for improving outreach to well owners and assessing the participant’s experiences with their own program performance. The descriptive questions will increase the utility of the statistical analysis by providing context about each program that the quantitative data cannot provide (past experiences and how they affected current approaches to outreach, etc).

A final report will be developed and published jointly by the University of Illinois and CDC. The report will describe the reasons for conducting the program, background on the development of the online data collection tool, the data collection process, how the responses were analyzed, the narrative responses and appropriate findings from those responses, an analysis of the data, how the findings inform the discussion on outreach to well owners, suggested approaches for outreach to well owners, and details about when and how those approaches have been shown to be most effective. The narrative responses will provide details of past experiences of environmental health staff at state, local, and tribal environmental health and agricultural departments who are government employees and who conduct outreach to private well owners, including lessons learned and what they would do differently if they were starting a new program. The report will also include appendices that provide data on the public portions of the programs that took part in the study.

In addition to the report, a presentation of the results will be given at a national conference that would include the respondent universe, and information developed for the report may be summarized in a paper to be submitted to a relevant peer reviewed journal. The results will also be distributed through the network of this respondent universe identified through the PI’s Private Well Class program. CDC will also distribute the report and report findings through their networks, such as the Private Well Initiative.

Project Time Schedule

Task	1 st Qtr	2 nd Qtr	3 rd Qtr	4 th Qtr
Obtain OMB Clearance for Data Gathering (8 weeks)	XX			
Develop List of Programs to Contact	XXX			

Call Programs to Gather Information	X	XX		
Visit Programs to Gather Information (Intern)		XXX	X	
Input Information into Project Database	XXX	XXX	XX	
Assess Program Information		XX	XXX	XX
Progress Reports to Sponsor		X		X
Apply Approaches to Private Well Class Program			XXX	X
Assess Success of Approaches Used with PWC				XX
Attend Conference to Present Project and Results				X
Write Final Report				XXX

X = 1 month

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

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification. These activities comply with the requirements in 5 CFR 1320.9.

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LIST OF ATTACHMENTS – Section A

ATTACHMENT A: MS Word Version of the Data Collection Instrument

ATTACHMENT B: Web Version of the Data Collection Instrument