
DATE: December 4, 2014

TO: Sherrette Funn, HHS

FROM: Helen Caton-Peters, ONC

RE: Request for Clearance of online survey regarding OMB No. 0955-0005, “Generic Communication Campaign for HITECH ACT”

Statement of Need

The Office of the National Coordinator for Health Information Technology (ONC) Office of the Chief Privacy Officer (OCPO) would like to conduct an online survey looking at the current practices and challenges of managing protected health information across different types of health care providers (specifically physician practices and acute-care hospitals). The survey will focus on practices and challenges related to providers’ ability to investigate and monitor internal access to protected health information.

The purpose of this data collection effort is to gather information necessary to inform communications to health care providers and other stakeholders regarding managing access to protected health information in different types of health care settings. The information gathered by the online survey will not be used to substantially inform any influential policy decisions.

Intended Use of Information

Understanding current practices for medical record access and disclosure transparency.
This study will investigate the following:

1. The nature and extent of inquiries and/or requests to provider organizations (physician groups and hospitals) for information regarding medical records access/disclosures; and
2. How these organizations respond to such inquiries, including the level and type of resources (*e.g.*, personnel, procedures, technologies) used for explicit investigations.

Expected Outputs:

1. Research Report

Executive summary and full report summarizing and analyzing the findings from the survey regarding current practices and challenges of managing protected health information across different types of health care providers (specifically physician practices and acute-care

hospitals), with specific focus on practices and challenges related to providers' ability to investigate and monitor internal access to protected health information.

2. Educational Recommendations and Communication Output

Health information professionals (HIP) working in physician practices and hospitals must use protected health information to do their jobs, but also face a complex (and changing) work, technical, and regulatory environment. This study will help to identify specific challenges faced by HIP staff for carrying out their work in this complex environment. It will also identify problems or areas of specific concern to develop recommendations for targeting educational training of HIP staff, as well as recommendations to provider organizations about how to better utilize and support HIP staff. Finally it will begin to identify any procedures, actions, and policies that appear successful for appropriate management of protected health information, on the path of developing recommendations for "best practices" for HIP staff and for provider organizations.

Data collection and analysis will inform where gaps are concerning medical record access and areas that require development of technical assistance for best practices. Specific technical assistance to address these gaps will be developed and distributed via HealthIT.gov. Presentations on findings may be developed for utilization in appropriate settings.

The information collected will be used to inform communications to health care providers and other stakeholders regarding managing access to protected health information in different types of health care settings. In particular, the information gathered by the survey will be used to create educational and communication materials for providers regarding responding to requests for information regarding medical records access and disclosures.

Oversight for this online survey is provided by OCPO, within ONC.

Description of Participants

The online survey will engage health care providers and health information professionals at physician practices and acute-care hospitals. Participants will be selected from a national population of 14,000 health information professionals who are members of a national professional association for the field of medical record management, have mid-level job codes as Technicians, Manager/Supervisor, Technology Role, or Clerical/Administrative Support, and who work in acute-care hospitals and/or physician practices. A simple random sample of 3,000 will be selected to invite via email message to participate in the online survey. They will receive two follow up invitations after one and two weeks of the initial invitation.

Information Collection Procedures

Active enrollment in a national professional association for the field of medical record management, with a mid-level job code as Technician, Manager/Supervisor, Technology Role, or Clerical/Administrative Support, and employment in an acute-care hospital and/or physician

practice, along with willingness to complete the survey, will be the only screening requirements to participate in the online survey. The survey will be conducted online.

An initial email, in addition to two reminder emails will be sent to participants. The content of these three emails to participants can be found in **Appendix A**.

The initial recruitment email and two reminder emails will provide respondents with a link to an online survey. The online survey will be completed by participants and will display the OMB clearance number, expiration date, and burden disclosure statement. The online survey can be found in **Appendix B**.

The recruitment emails are scheduled to go out, and survey data is scheduled to be collected, from December 8 – December 19, 2014.

Information that could be used to identify individual participants will not be provided to HHS and its agencies. No names will be associated with individuals’ responses in our reports.

Table 1. Focused Discussion Description

Type of Respondent	Form Name	No. Of Respondents	No. of Responses	Average Burden Per Respondent	Total Burden Hours
Providers	Recruitment email (initial email plus 2 reminder emails)	3000	3	1 minute	150 hours
Providers	Online survey	3000	1	10 minutes	500 hours
Totals					650 hours

Incentive

No monetary incentive will be offered for their voluntary participation in this assessment.

Justification for Proposed Assessment Methodology

I am proposing this methodology in order to answer the question, “How does your practice investigate and monitor internal access to protected health information.” I am seeking OMB approval to conduct this study on more than eight participants in order to improve ONC’s understanding of how providers currently manage access to protected health information and to develop communications and educational materials for providers related to managing access to protected health information. Alternative methodologies for investigating the same question would involve greater resources and a greater burden on the public.

Estimated Response Burden

The recruitment emails are designed to be readable by participants in less than one minute. They consist of one initial email and two reminder emails. The online survey is designed to take 10 minutes per participant. Thus, the estimated total response burden anticipated for 3000 participants is approximately 650 hours.

ESTIMATED TOTAL BURDEN HOURS for user research = 650 hours

The cumulative number of hours used under OMB No. 0955-0005 is 650 hours.

APPENDICES [IN SEPARATE FILES]

- A. Recruitment emails
- B. Online survey