SECTION A. JUSTIFICATION:

1. Explain the circumstances that make the collection of information necessary.

In the past, the US Office of Personnel Management (OPM) contracted with a vendor to collect and analyze Federal Employees Health Benefits (FEHB) carrier-specific Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey results. Each FEHB plan is required to administer the CAHPS survey annually to a sample of their membership, which has included Federal employees <u>and</u> retirees. CAHPS surveys ask consumers and patients to report on and evaluate their experiences with their health care.

Currently, the CAHPS survey instrument is designed for the active population and will no longer be administered to retirees. However, OPM believes that gathering feedback from annuitants about their health plan experience is an essential part of benefit administration. The Federal Annuitant Benefits Survey (FABS) is designed to collect feedback from the annuitant subgroup that was removed from the CAHPS sample.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The results from the FABS sections, "Your Health Plan Experience" and "Prescription Drug Coverage" will provide OPM with insight into how annuitants rate the quality of care they receive through the FEHB Program. The results of these sections will help Contract Officers and the FEHB Policy group assess how the annuitant population accesses health care and will help determine whether or not they receive needed care in a timely manner.

The "Health and Wellness" section of the FABS will inform OPM about the overall health status of the annuitant population. Obtaining this information is vital when tailoring wellness programs and benefits to the annuitant population. All of the information obtained from the FABS will guide FEHB benefit and program policy development, as member feedback is a critical component of successful FEHB program administration.

Reports based on FABS findings will be made available on OPM's website for public access.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

To maximize accessibility to the annuitant population, the FABS will be administered via an "open participation" link posted on OPM's website. This method of administration will ensure that participation is not limited to only annuitants who have provided an email address to OPM. (Typically, OPM-administered surveys are administered to a sample of individuals via e-mail). All responses will be electronic and must be submitted via the web for consideration. Paper forms will not be available for print or download. Reports based on FABS findings will be made available on OPM's website for public access.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

We don't believe that the same or similar information to that proposed to be collected in FABS is being gathered elsewhere. The FABS was developed in order to continue to collect feedback from annuitants, an important subgroup of the FEHB population, after the Medicare population was removed from the Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey. During the FABS development process, OPM explored the possibility of administering a modified CAHPS survey (or the Medicare CAHPS survey.) Of major concern was the fact that according to NCQA protocol, members with Medicare as their primary coverage should be excluded from the Commercial CAHPS Adult Questionnaire. Through conversations with our Federal partners the Agency for Healthcare Research and Quality (AHRQ), the Center for Medicare and Medicaid Services (CMS), and the National Committee for Quality Assurance(NCQA), OPM determined that neither a modified version of the CAHPS survey nor the Medicare CAHPS were feasible options.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

N/A, the FABS has no impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

If the FABS is not administered, the FEHB Program would lose program and consumer feedback from a key population subgroup. Annuitants are a large subgroup of the FEHB population, thus making it critical to learn about how they access care and how they view the quality of the health care they receive. The FABS will be administered on an annual basis in order to sync up with the Consumer Assessment of Healthcare Providers and Systems (CAHPS) survey administered to the FEHB active population.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

None of the special circumstances listed above are relevant to the FABS.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB.

On June 10, 2015 a 60 Day Federal Register Notice was published at 80 Fed. Reg. 23,995. One group filed comments and OPM responded.

9. Explain any decision to provide any payment or gift to respondents, other than renumeration of contractors or grantees.

N/A

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Data will be collected anonymously from participants via "open participation" survey link posted on OPM's website. Identifying information such as name, email, Social Security Number or birthdate will not be collected as part of this survey effort, and at no point will participants be linked in any way with identifying information from a personnel database.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

Participants in the FABS will not be asked to provide answers to questions of a sensitive nature. The questions used in the demographics section are standard survey protocol and mirror questions included in the Federal Employee Viewpoint Survey.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Since the FABS will be administered via an "open participation" link on OPM's website, a projected response rate cannot be calculated at this time. OPM estimates that the survey will take participants approximately 20 minutes to complete and will be administered free of charge by OPM.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

There is no additional cost associated with the administration and reporting of the FABS beyond the labor costs for staff managing the project.

14. Provide estimates of annualized costs to the Federal government.

Administration of the FABS will not incur any costs beyond the normal labor costs for staff.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.

This is a new program.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions. The FABS will be administered as soon as all relevant clearance processes have concluded. The survey will remain in the field for approximately two months. Upon conclusion of survey administration, results will be analyzed; reports will be drafted and cleared for web posting.

The results of the FABS will be available on OPM's website. Basic survey analysis techniques (e.g., calculating frequencies) will be used to interpret and explain the data provided by respondents. The results will be used to create written reports that summarize the annuitant population's feedback about the flexibilities and benefits available to them.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

N/A

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions,"

N/A