

## **SUPPORTING STATEMENT A**

APPLICATION FOR TRAINING  
OMB# 0920-0017

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**APPLICATION FOR TRAINING**  
**OMB No. 0920-0017**

**A. JUSTIFICATION**

**Goal:** This is not a study. CDC collects information through electronic data collection instruments, (1) the Training and Continuing Online (TCEO) New Participant Registration form that allows health professionals to register for a training account through which they can access training courses and apply for continuing education, and (2) the Training and Continuing Education Online (TCEO) Proposal that course developers will complete and submit for their educational activities to receive continuing education accreditation.

**Intended Use:** CDC uses the information provided in the TCEO New Participant Registration to generate certificates of attendance or continuing education as verification of training activity attendance and produce participant transcripts when requested. CDC will use the TCEO Proposal to review and approve proposals for educational activities to receive continuing education accreditation.

**Methods to be used to collect:** No statistical methods are used to collect this voluntary information which is submitted through an electronic (TCEO) collection via online web-based forms. Respondents voluntarily populate the required data fields.

**Subpopulation:** A subpopulation study is not applicable to these information collection instruments.

**How data will be analyzed:** No statistical methods are used to analyze the information collected. CDC tracks participants' training activities using the identifiable information that facilitates the retrieval of historical information, creates aggregate reports on attendance, and CDC will create aggregate reports on educational activities submitted for accreditation.

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

This Information Collection Request (ICR) is for Revision of a currently approved information collection. Approval is requested for 3 years.

CDC is accredited by multiple accreditation organizations to award continuing education for health professionals. CDC's Center for Surveillance, Epidemiology, and Laboratory Services (CSELS) coordinates CDC's continuing education activities. To comply with the requirements of the accreditation organizations, CDC requires health professionals seeking continuing education to use the Training and Continuing Education Online (TCEO) system. To use this web-based system, learners must first establish a participant account by completing the Training and Continuing Education Online New Participant Registration form (henceforth: TCEO New Participant Registration; Attachment 3). The electronic form collects the required information needed to coordinate learner registration for training activities including classroom study,

conferences, and e-learning. The Training and Continuing Education Online Proposal (henceforth: TCEO Proposal; Attachment 4) is a new tool that CDC course developers or CDC partner course developers will use to electronically apply for course accreditation. This paperless process expedites submission, review, and accreditation processes. Both information collection instruments will continue to provide CDC with the information necessary to accredit and effectively manage the training activities pertinent to its mission to strengthen the skills of the current workforce through quality, accredited, competency-based training.

An application for training data collection is necessary for course registration, verification of training activity attendance, and for assuring CDC's compliance with continuing education accreditation requirements. CDC is accredited by 7 accreditation organizations: Accreditation Council for Continuing Medical Education, International Association for Continuing Education and Training, National Commission for Health Education Credentialing, National Board of Public Health Examiners, American Nurses Credentialing Center's Commission on Accreditation, Council for Pharmacy Education as a provider of continuing pharmacy education, and the American Association of Veterinary State Boards, Registry of Approved Continuing Education. The accrediting organizations have specific requirements for tracking participants' training activities and identifiable information to facilitate the retrieval of historical information for a period of 7 years following course completion.

From June 1, 2013 through May 31, 2015, 240,975 new participants registered for training using the TCEO New Participant Registration. An increase in new registrants has been observed since the last Information Collection Request which estimated 75,000 new registrants. This increase can be explained by several factors. Over the past 3 years, CDC has intensified marketing CDC trainings through the [CDC Learning Connection](#) website, social media, and GovDelivery messages. Additionally, 2015 requirements for childhood vaccine providers to complete specific trainings in order to administer vaccines impact on registrations for training through TCEO New Participant Registration and accreditation of CDC vaccine-specific trainings for learners to obtain continuing education through TCEO.

In recent years, CDC programs have asked CDC/CSELS to accredit partners' trainings, directly working with the partners. Additionally, CDC programs have submitted increasing numbers of training proposals for continuing education. CDC is introducing a TCEO-system generated electronic, paperless process to meet these requests and increased demands, and to expedite the accreditation processes for submission, review, and approval of training proposals for continuing education. An electronic mechanism will help CDC meet accreditation organization requirements and improve its processes for review, assessment, and decision making associated with continuing accreditation and future continuing education offerings.

The current OMB approval expires May 31, 2016. In addition, the TCEO system is being redesigned for enhanced usability after 10 years of operations and maintenance.

This collection of information and data from health professionals is authorized by the Public Health Service Act, Title 42, The Public Health and Welfare, Chapter 6A-Public Health Service, 1) Subchapter V-Health Professions Education, Part E-Health Professions and Public Health Workforce, subpart 2-public health workforce [Section 295](#) (Attachment 1A); 2) Subchapter V-Health Professions Education, Part F-General Provisions, Health Professions Data [Section 295k](#) (Attachment 1B); and by Title 42, Subchapter II, General Powers and Duties, Part B, Federal-State Cooperation, [Section 243](#) (Attachment 1C).

## 2. Purpose and Use of the Information Collection

This ICR is comprised of the following information collection instruments: **Training and Continuing Education Online New Participant Registration** (Attachment 3), **Training and Continuing Education Online Proposal** (Attachment 4). The proposed revisions affect minor changes to the TCEO New Participant Registration and the method in which the data is collected. Over the years, a steady increase in the number of registered TCEO learners has demonstrated the demand for continuing education and resulted in a need for increased burden hours. The addition of the TCEO Proposal will help expedite the process for accrediting courses and allow CDC to offer more continuing education to health professionals.

The information collected via the TCEO New Participant Registration allows CDC/CSELS to award continuing education to physicians, nurses, health education specialists, pharmacists, veterinarians, and other health professionals who register for continuing education accredited trainings.

Learners, external and internal to CDC, must be authenticated; health professionals seeking continuing education complete the TCEO New Participant Registration once per new registration. Data from the TCEO New Participant Registration are entered into tracking databases and used to generate certificates of attendance or continuing education as proof of participants' attendance, aggregate reports, or produce transcripts when requested. Continued use of the TCEO New Participant Registration information collection instrument allows CDC to comply with accreditation organizations' requirements, coordinate learner registration, manage and offer continuing education accredited training activities, and provides information necessary to aggregate responses for CDC to implement overall program evaluation.

CDC and its partners develop training products for the public health and healthcare (henceforth health) workforce to help increase their knowledge and skills and meet their professional training needs. The proposed addition of the TCEO Proposal provides a paperless approach for CDC programs' and CDC partner course developers to request and submit their course applications for accreditation. Implementation of the TCEO Proposal through the TCEO system will enhance collaboration with course developers and expedite CDC's review during the continuing education accreditation process. The TCEO Proposal will provide information and an easier mechanism to aggregate data for assessment and reporting. Once CDC accredits a course, registered learners can access and take the course for continuing education through the TCEO New Participant Registration.

The proposed revisions — minor modifications to the TECO New Participant Registration and implementation of the new TCEO Proposal — provide efficient and integrated electronic mechanisms that meet accreditation requirements and promote the use of secure data and information system standards to improve the timeliness, accuracy, completeness, and consistency of data collection.

Without the use of these TCEO applications for learners to register and CDC to accredit trainings, CDC would face the following negative consequences: health professionals would be unable to register for training courses offered by CDC; CDC would not be able to award continuing education for partner-developed trainings; and CDC would be unable to assess learning needs or plan and manage trainings. Opportunities for obtaining continuing education and professional

competence of health workers would decline in the United States, thus negatively impacting both domestic and international public health.

The National Laboratory Training Network Registration Form, data collection instrument which has been used by health professionals seeking laboratory training to register for training activities and approved under OMB 0920-0017, is removed from this Information Collection Request.

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

Data is collected electronically for 100% of the TCEO information and data collection instruments. TCEO provides an efficient integrated system that meets accreditation requirements for learners' course registrations and for continuing education developers to submit proposal applications. TCEO assures 100% compliance with the Government Paperwork Elimination Act (GPEA), Public Law 105-277, title XVII, 1998, lowering the burden to the respondent, allowing individuals to submit information electronically, and providing capabilities for CDC to maintain records electronically.

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

The required information is specifically intended for learners' course registrations and for course developers to submit continuing education proposals to CDC. This information is not available from any other source and must be collected, stored, and secured according to accreditation requirements. CDC's TCEO information collection instruments are designed for uniformity and standardization, which are required for tracking attendance in the course offerings, meeting the accreditation organizations' standards, and distinguishing professional groups for aggregate reporting purposes. No other CDC component requests this information for training activities offered by CDC through TCEO.

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

No small businesses will be involved in the data collection.

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

Information collected through these instruments is submitted voluntarily and not sought after by CDC. Data are collected once per new registration in the TCEO New Participant Registration, or once per course submitted for accreditation in the TCEO Proposal. The timeliness of data collected during the registration process is critical for a registrant to receive continuing education and maintain certification or licensure. Learners, once registered, have the option to update their information when it changes or when they apply for continuing education for a specific course. The timeliness of data collected for TCEO Proposal will result in timely award of accreditation for a course submitted for accreditation. If CDC was not able to collect these data in a timely manner as proposed or was unable to collect these data, CDC's ability to meet its mission and DSEPD's goal to strengthen the skills of the current workforce through quality, accredited, competency-based training would be compromised.

## **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. A 60-day Federal Register Notice was published in the Federal Register on February 2, 2016, vol. 81, No. 20, pp. 5127-5129 (Attachment 2). CDC received no public comments related to this notice.
- B. Though no formal consultations outside the agency have been held, CDC encourages respondent comments in the evaluation segment of each training activity. No problems have been identified concerning the completion of TCEO New Participant Registrations. Pilot testing of the TCEO Proposal did not reveal any problems associated with completion of this information collection.

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

There are no payments or gifts to respondents.

## **10. Protection of the Privacy and Confidentiality of Information Provided by Respondents**

The CSELS' Information Systems Security Officer reviewed the information collection and determined that the Privacy Act does apply based on the collection of information in identifiable form (IIF). Information in identifiable form data collection includes only the minimum elements to satisfy requirements for continuing education applications and continuing education course proposals.

Categories of identifiable information CDC collects on the TCEO New Participant Registration (Attachment 3) include: name, mailing address, phone numbers, and email address. Accrediting organizations require identifiable information for tracking attendance in the course offerings, authenticating the individual learner who receives the continuing education, and managing the transcript for that learner.

Categories of identifiable information CDC collects on the TCEO Proposal (Attachment 4) include: course developer name, phone numbers, email address, and organization the course developer represents. In addition, CDC collects biographical data for the course presenters which includes: presenter name, profession, phone numbers, address, email address, and organization. CDC uses this information for managing reviews, corresponding with the course developer of a proposed continuing education activity, and to meet accreditation organization requirements, thereby ensuring national accreditation standards are met prior to accrediting the continuing education activity.

This information collection is covered under the Privacy Act System of Records Notice (SORN) 09-20-0161, "Records of Health Professionals in Disease Prevention and Control Training Programs," (Attachment 5) published by the Office of the Federal Register, Public Act



Assurances: 2011, available online at <http://www.cdc.gov/SORNnotice/09-20-0161.htm>.

Safeguards have been established to minimize the possibility of unauthorized access to the information being collected via the TCEO system. Technical controls include storing all personal identifiable information on a Microsoft SQL server, configured behind the CDC firewall. Physical controls include the use of a secure data center, which requires identification badges and authorized key cards for entry. Security provisions meet all requirements established by CDC's Health Information System and Surveillance Board. Administrative Controls restrict access to the SQL database, ensuring accessibility only through the TCEO application, for CDC/CSELS administrative personnel and IT staff. Although contractors at CDC maintain the TCEO system, or support the collection and administration of learner data and continuing education proposals, CDC owns the information collections. Data are not sold, rented, or shared with third parties for promotional use or otherwise. Data are and will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law.

Other administrative controls include the system's Security Plan, which defines the process for handling security incidents. The system's team and the Office of the Chief Information Security Officer (OCISO) share the responsibilities for event monitoring and incident response. Suspicious security or adverse privacy related events are directly reported to the component's Information Systems Security Officer, CDC helpdesk, or to the CDC Incident Response Team. The CDC OCISO reports to the HHS Secure One Communications Center, which reports incidents to US-CERT as appropriate.

Personally identifiable information collected by the TCEO New Participant Registration is filed and retrieved by the name of the individual, but it is not published. An advisement/consent notice is provided for all TCEO learners and is clearly displayed immediately above Public Burden Statement section of the TCEO New Participant Registration on the login page. The statement is, "The Privacy Act applies to this information collection. The requested information is used only to process your training registration. CDC will treat data/information in a secure manner and will not disclose, unless otherwise compelled by law or upon your written request. Continuing education credit can only be provided when all requested information is submitted."

Personally identifiable information collected by the TCEO Proposal is filed and retrieved by the name of the individual, but it is not published. An advisement/consent notice is provided for all TCEO course developers and is clearly displayed immediately above Public Burden Statement section of the TCEO Proposal on the login page. The statement is, "The Privacy Act applies to this information collection. The requested information is used to process your request for educational activities to receive continuing education accreditation. CDC will treat data/information in a secure manner and will not disclose, unless otherwise compelled by law or upon your written request. Continuing education accreditation can only be conferred when all requested information is submitted."

Personal information is maintained for at least 7 years. CDC will retain and destroy records in accordance with the applicable CDC Records Control Schedule.

## **11. Institutional Review Board (IRB) and Justification for Sensitive Questions IRB Approval**

IRB is not required for this information collection. This data collection is not considered research based on the description and justification as defined by the federal policy for the protection of human subjects (45 CFR 46) (Attachment 6, Research Determination Memorandum)

### **Sensitive Questions**

These information collections contain no sensitive questions.

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

### **A. Estimated Annualized Burden Hours**

TCEO New Participant Registration respondents are health professionals (learners). The number of new learners for a 2-year period from June 1, 2013 through May 31, 2015 who registered for training was 240,975. When annualized, this represents 120,487 total TCEO New Participant respondents, which compares to an annualized 75,000 TCEO New Participant respondents projected in the 2013-approved OMB No. 0920-0017, Application for Training Information Collection Request. CDC anticipates continued increases in the number of learners who will complete a TCEO New Participant Registration application. CDC projects 200,000 learners will complete the TCEO New Participant Registration form for a total annual respondent burden of 16,667 hours. It will take an average of 5 minutes for an applicant to complete a registration application once. TCEO New Participant Registration respondents are not contacted for information, but provide information, voluntarily, the first time they register in TCEO or once per course.

Respondents to the TCEO Proposal are CDC and CDC partner course developers. CDC estimates 120 CDC partner organization course developers will use the TCEO Proposal each year. It will take approximately 5 hours for a course developer to enter information once for a TCEO Proposal. The total annual respondent burden for completing the TCEO Proposal is 600 hours. Course developers voluntarily complete and submit the TCEO Proposal once for each course they request accreditation.

Total annual respondent burden is 17,267 hours for the two information collection instruments. The hour-burden estimates include the time for reviewing instructions. Total burden hours were calculated for each information collection by multiplying the number of respondents by the number of responses per respondent by the average number of hours required for each response. CDC then added burden hours for each information collection instrument to estimate the total burden hours. The estimates of 5-minutes for the TCEO New Participant Registration and 5-hours for the TCEO Proposal were determined by randomly selecting <10 respondents to complete each instrument and timing their efforts. The average burden per response is represented as 5/60 hours for the TCEO New Participant Registration and 5 hours for the TCEO Proposal. Table 1 presents the total burden hours CDC requests for this clearance.

**Table 1. Estimates of Annualized Burden**

Type of Respondent	Form Name	No. of Respondents	No. Responses per Respondent	Avg. Burden per Response (in hours)	Total Burden Hours
Health Professionals	Training and Continuing Education Online New Participant Registration	200,000	1	5/60	16,667
Health Educators	Training and Continuing Education Online Proposal	120	1	5	600
<b>Total</b>					<b>17,267</b>

**B. Estimated Annualized Cost to Respondents**

CDC used the Department of Labor (careeronestop.org) 2014 wage tables to estimate the hourly wage rate for health professionals (Attachment 7). Because health professionals are represented by a wide range of professions and a variety of settings, an average was taken from the wage tables of five health professions presented in Attachment 7 to determine annual cost.

CDC calculated the annualized cost burden for each information collection instrument by multiplying the total burden hours by the hourly wage, then added the cost burden for each instrument for the total cost burden.

The total estimated annualized cost to respondents is \$1,526,064 for the two information collection instruments. The cost estimates for the TCEO New Participant Registration total \$1,500,030 and the respondent costs associated with the TCEO Proposal total \$26,034. Table 2 presents the total estimated annualized cost to respondents for this clearance.

**Table 2. Estimated Annualized Burden Costs**

Type of Respondents	Form Name	No. of Respondents	No. Responses per Respondent	Avg. Burden per Response (in hours)	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Health Professionals	Training and Continuing Education Online (TCEO) New Participant Registration	200,000	1	5/60	16,667	\$90.00	\$1,500,030
Health Educators	Training and Continuing Education Online (TCEO) Proposal	120	1	5 hours	600	\$43.39	\$26,034
<b>Total</b>							<b>\$1,526,064</b>

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

The data collection instrument and associated processes have been in place as early as 1995.

Capital and start-up cost of implementing the new TCEO Proposal is estimated at \$150,000. This amount includes 1 non-fulltime equivalent software engineer at 60 % time and costs for required computer equipment, for the year following OMB approval. Total annualized operation and maintenance cost of the entire TCEO system is \$250,000.

### 14. Annualized Cost to the Government

CDC estimates that the annual cost to the government for the information collection instruments is \$617,048, which is \$335,524 for TCEO New Participant Registration and \$281,524 for the TCEO Proposal. This includes personnel costs associated with registration and data management. The cost breakdown is shown in Table 3 and described below.

Annualized cost estimates for the TCEO New Participant Registration include 1 fulltime equivalent federal employee project manager at 50% time dedicated to system oversight (\$47,524); 4 non-fulltime equivalent staff: 3 user specialists at 100% time and 1 software engineer at 100% time, each dedicated to system maintenance and learner support (\$288,000).

Cost estimates for TCEO Proposal include 1 fulltime equivalent project manager at 50% time dedicated to system oversight (\$47,524); 4 non-fulltime equivalent staff: 3 user specialists at 100% time and 1 software engineer at 100% time, each dedicated to system maintenance and learner support (\$216,000). 1 non-fulltime equivalent dedicated at 25% time to system maintenance and developer support (\$18,000).

**Table 3. Annualized Cost to the Government**

<b>Form Name</b>	<b>Federal Employees</b>	<b>Contractors</b>	<b>Total Cost</b>
Training and Continuing Education Online (TCEO) New Participant Registration	\$47,524	288,000	\$335,524
Training and Continuing Education Online (TCEO) Proposal	\$47,524	\$234,000	\$281,524
<b>Total</b>			<b>\$617,048</b>

### 15. Explanation for Program Changes or Adjustments

Proposed changes for this revision of OMB No. 0920-0017 are due to agency discretion. One involves removal of the National Laboratory Training Network Registration Form from this Information Collection Request for Revision.

Since submission of the previous ICR OMB No. 0920-0017, to meet rising demands of increased number of learners seeking continuing education through the TCEO New Participant Registration, CDC has required more staff to administer and maintain the system. TCEO New Participant Registration data from June 1, 2013 through May 31, 2015 validated CDC's

observation that a steady growth in the number of TCEO learners registering for continuing education. Recently, CDC increased promotion of CDC and CDC partner accredited continuing education through CDC Learning Connection activities. Increased demands for vaccine-specific training to meet the 2015 requirements for childhood vaccine providers to complete specific trainings in order to administer vaccines are expected to continue. The aforementioned factors validate CDC’s need to request additional burden hours for the TCEO New Participant Registration.

Annualized cost to the government has increased since submission of the previous ICR OMB No. 0920-0017, from \$314,092 to \$617,048. This program change is due to agency discretion for learner support, system administration, development, and maintenance.

CDC has received increased requests for administration of continuing education accreditation for partner-generated trainings. The addition of the TCEO Proposal as an electronic form to facilitate applications for accreditation illustrates a program change due to agency discretion that complies with the Government Paperwork Elimination Act (GPEA), and offers a more streamlined mechanism for CDC and CDC partners’ course developers to request and submit their course applications for continuing education accreditation.

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

This ICR is a request for revision of a 3-year clearance of official registration application forms for training activities and implementation of a new electronic data collection, the TCEO Proposal for course developers to complete and submit for their courses to receive continuing education. The information collection instruments provide CDC with the information necessary to manage, conduct, and accredit training activities pertinent to its mission to strengthen the skills of the current workforce through quality, accredited, competency-based training. The information collected allows CDC to send registration confirmations to participants, provide certificates of attendance or continuing education as proof of participants’ attendance, and generate aggregate reports on attendance, and accredit training activities. These data collections are necessary for course registration, verification of training activity attendance, and compliance with continuing education accreditation requirements. CDC/CSELS Division of Scientific Education and Professional Development has no plans to use data from these information collections other than as stated.

**Timeline of Key Events Following Receipt of OMB Clearance for Revision Request**

<b>Activity</b>	<b>Time Schedule</b>
TCEO New Participant Registration Data Collection	Following receipt of OMB clearance, CDC will continue collecting data throughout the approval period.
Training and Continuing Education Online (TCEO ) Proposal	Following receipt of OMB clearance, CDC will begin collecting data throughout the approval period and transition to the new interface for data collection.

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

The display of the OMB expiration date is not inappropriate.

**18. Exceptions to the Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.