Supporting Statement A for Paperwork Reduction Act Submission for

Reinstatement with Change

Data Collection for the Residential Care Community and Adult Day Services Center Components of the National Study of Long-Term Care Providers

> OMB No. 0920-0943 Discontinued: 04/30/2015

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## SUPPORTING STATEMENT

### National Center for Health Statistics

## Data Collection for the Residential Care Community and Adult Day Services Center Components of the National Study of Long-Term Care Providers

- The goal of this study is to collect data for the residential care community (RCC) and adult day services center (ADSC) survey components of the 3rd wave of the National Study of Long-Term Care Providers (NSLTCP). The data to be collected will include the basic characteristics, services, staffing, and practices of RCCs and ADSCs, and aggregate-level distributions of the demographics, selected health conditions and health care utilization, physical functioning, and cognitive functioning of RCC residents and ADSC participants.
- National data on the characteristics of RCCs and ADSCs will be used by DHHS for program planning and to inform national policies. Data from NSLTCP will be available to analyze relationships that exist among provider and user characteristics at national and state levels.
- NSLTCP uses three modes; mail and web with telephone follow-up of nonresponders to the mail and web surveys. In addition, data retrieval telephone calls will be used to address item non-response for critical items in the returned mail questionnaires. The intended respondents are directors of RCCs and ADSCs or their designated staff.
- A sample of 11,690 RCCs and a census of about 5,400 ADSCs in the 50 states and the District of Columbia will be contacted to participate in the survey.
- For both the ADSC and RCC 2016 survey components of the NSLTCP, RDC restricted data files with no identifiers and no linking information are planned to be made available. We also plan to produce an overview report, data briefs, state estimates, national weighted survey estimates, and a trend report using 2016 data.

## A. Justification

## **<u>1. Circumstances Making the Collection of Information Necessary</u>**

This request is for a reinstatement with change for a project (OMB No. 0920-0943 Discontinued 04/30/2015) to collect data for the residential care community (RCC) and adult day services center (ADSC) components of the 2016 wave of the National Study of Long-Term Care Providers (NSLTCP). We conducted data collection in 2014, and based on what we learned from this experience, we would like to make a few changes.

Long-term care (LTC) already is a significant component of health care and will become even more important as the population ages. The number of people in the United States 65 years and over is projected to nearly double in the next quarter century, growing to more than 71 million people by 2030. Current projections estimate that people turning age 65 will require on average

three years of LTC over the rest of their lives. Public programs pay for a substantial share of LTC services. Having sufficient information to guide those programs is essential.

Between the 1970s and 2000s, the foundation of the LTC component of the NCHS National Health Care Surveys has been the National Nursing Home Survey (NNHS), OMB No. 0920-0353, and the National Home and Hospice Care Survey (NHHCS), OMB No. 0920-0298. Most recently, in light of the growth in interest in alternative LTC settings, NCHS conducted the National Survey of Residential Care Facilities (NSRCF), OMB No. 0920-0780. NSRCF is a nationally representative sample survey of U.S. assisted living and other residential care communities; NSRCF was conducted once in 2010 and was not planned to be continued.

In 2012 NCHS launched an integrated strategy for obtaining and providing representative national and state statistical information about the supply and use of paid, regulated LTC providers in the United States—the National Study of Long-Term Care Providers (NSLTCP). NSLTCP has replaced NNHS, NHHCS, and NSRCF. NSLTCP enables more efficient monitoring of the dynamic and diverse industry of paid, regulated LTC and helps address the nation's information needs to inform future LTC policy.

Medicare beneficiaries with chronic conditions and functional limitations needing LTC assistance represent over half of Medicare's highest health care spenders (Komisar and Feder, 2011). The NSLTCP supports CDC's broader research agenda and NCHS' mission to provide statistical information to guide actions and policies to improve the health of the American people by delivering national and state information on the supply, provision, use, and characteristics of the major sectors of paid, regulated LTC. The NSLTCP, a voluntary survey, is designed to (1) broaden CDC's/NCHS' ongoing coverage of the major sectors of paid, regulated long-term care (LTC) services; (2) use existing administrative data on LTC providers and service users where available (i.e. Centers for Medicare and Medicaid Services (CMS)' data on nursing homes and residents, home health agencies and patients, and hospices and patients); (3) collect primary data on LTC providers and service users for which nationally representative administrative data do not exist (ADSCs and participants, RCCs and residents); and (4) enable comparisons across LTC sectors and timely monitoring of supply and use of these sectors over time.

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. Specifically, NCHS is authorized to collect statistics on health resources, including extended care facilities, and the utilization of health care, including utilization of extended care facilities. ADSCs and RCCs are considered such facilities. A copy of this authorization is provided as **Attachment A**.

### 2. Purpose and Use of the Information Collection

NSLTCP, a biennial survey, includes providers and service users in five major LTC sectors home health care agencies and patients, assisted living and other residential care communities (RCCs) and residents, adult day services centers (ADSCs) and participants, nursing homes and residents, and hospices and patients. As CDC/NCHS did in 2012 and 2014, the data to be collected in 2016 include the basic characteristics, services, staffing, and practices of RCCs and ADSCs, and aggregate-level distributions of the demographics, selected health conditions and health care utilization, physical functioning, and cognitive functioning of RCC residents and ADSC participants. As in 2012 and 2014, the NSLTCP survey will be administered by mail, web, and telephone, and data will be collected from a sample of 11,690 RCCs and a census of about 5,400 ADSCs in the 50 states and the District of Columbia to enable producing national and state estimates. A two year approval is sought.

Expected users of data from this collection effort include, but are not limited to CDC; other Department of Health and Human Services (DHHS) agencies, such as the Office of the Assistant Secretary for Planning and Evaluation and the Agency for Healthcare Research and Quality; associations, such as LeadingAge (formerly the American Association of Homes and Services for the Aging), National Center for Assisted Living, American Seniors Housing Association, Argentum (formerly the Assisted Living Federation of America), and National Adult Day Services Association; universities; foundations such as The SCAN Foundation; and other private sector organizations such as the Alzheimer's Association and the AARP Public Policy Institute.

The collected data will enable users to continue to include the RCC and ADSC components in the following activities:

(1) Estimate the U.S. national supply of paid, regulated LTC services;

(2) Estimate key policy-relevant provider characteristics and practices;

(3) Estimate the national use of these providers;

(4) Estimate key policy-relevant characteristics of these users;

(5) Within the above goals, produce state-level estimates for as many states as feasible within NCHS confidentiality and reliability standards; and

(6) Enable comparisons within and between different LTC sectors at a similar point in time as well as monitoring trends over time.

As with the 2012 and 2014 NSLTCP waves, the 2016 NSLTCP survey data for ADSCs and RCCs and administrative data for nursing homes, home health agencies and hospices will be used to develop an overview report with national estimates on the supply, use, and characteristics of these five major sectors of paid, regulated LTC in the United States (NCHS Series 3 report) and a web-based product with state estimates to complement the Series 3 report. As with the 2012 and 2014 NSLTCP, the ADSC and RCC 2016 survey data will also used to produce NCHS data brief reports with national estimates on ADSC centers and participants and RCC communities and residents, respectively, and web-based state estimates to complement these data briefs, as well as survey national estimates on ADSCs and RCCs. Starting with the 2016 data, NCHS intends to create additional products to examine trends over time. Before any of these products are published, NCHS will make available through the NCHS Research Data Center the restricted ADSC and RCC 2016 survey data files, as we have done for the 2012 and 2014 survey data. Please go to http://www.cdc.gov/nchs/nsltcp/nsltcp questionnaires.htm and http://www.cdc.gov/nchs/nsltcp/nsltcp\_products.htm to access RDC restricted files and products from the 2012 and 2014 waves of NSLTCP. To date, reports from the 2012 and 2014 waves have been used by researchers, other federal agencies, and national provider associations. To

date, the survey methods and protocol used for 2012 and 2014 have resulted in ADSC response rates of 58%-67% and RCC response rates of 50%-55%, the lower estimates in each range reflect 2014 the experience. We propose making protocol changes (proxy respondents, small RCCs to CATI earlier, two versions of questionnaires) as noted in the bulleted list below in order to try to obtain higher response rates in 2016 and adding two methods experiments in order to learn ways to further enhance the protocol to obtain higher response rates in future waves.

It is important to continue this data collection effort. The unique NSLTCP data on the characteristics of RCCs and ADSCs is used by DHHS for program planning and to inform national and state policies. Data from NSLTCP allows providers and researchers to analyze relationships that exist among provider and user characteristics. With the addition of 2016 NSLTCP data, users will also be able to examine trends over time since there will be three data points. No such national and state data exist elsewhere. We are proposing the following changes for 2016 based on the 2014 experience:

- Drop and revise select questionnaire items on RCCs and ADSCs that were fielded in 2014.
- Add questionnaire items on falls screening and interventions, hospice, advance directives, future waves of NSLTCP planning, and respondent feedback.
- Will have two versions of questionnaires so that we can add new content, but keep time burden as low as the 2014 wave.
- Add two methods experiments (Fedex for last mailing and advance letter variations) to inform protocol enhancements for future waves.
- Use proxy respondents to enable more completions.
- Start computer-assisted telephone interviewing (CATI) early for small RCCs to facilitate more completions in this sub-sector that has had lower response rates than larger RCCs in previous waves.

A comparison of the proposed 2016 questions and the 2014 questions that were fielded is in Attachments C-1 and C-2, and the 2016 NSLTCP questionnaire items are in Attachments D-1-D-4.

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

NSLTCP includes the use of improved information technology through its web-based questionnaire. We estimate that about 15% of respondents will respond to the web-based survey. Attachments I-1 and I-2 include the 2014 web-based questionnaire screen shots. We will revise them once the 2016 changes are approved.

Data collection will include mail, web and telephone modes to reduce burden on the respondent. We estimate that it will take 30 minutes on average to answer the questionnaire, for all three modes. Burden is reduced by limiting the number of questionnaire items to those that can be contained within an appropriately formatted 8-page hardcopy questionnaire. Burden is lowered through the use of sampling procedures for the RCC sectors in states where a sample is sufficient to produce RCC state estimates. Burden is also reduced by using the smallest reference period feasible to produce valid estimates when asking aggregate service user questions, e.g., how many residents were discharged from the hospital in the last 90 days, as longer reference periods would require additional respondent burden to calculate.

For non-responders to the mail and web surveys, burden is also reduced because data will be collected using CATI (Computer Assisted Telephone Interviewing) software, administered by professionally-trained interviewers. The CATI system allows interviewers to move quickly through the questionnaire and will modify questions based on responses to prior questions. The web and CATI versions of the questionnaires are being programmed using the same software platform and system. For both the web and CATI versions of the questionnaires, only questions specific to the individual RCC or ADSC characteristics are asked, skipping unnecessary questions. For example, RCCs responding that they are not authorized or otherwise set up to participate in Medicaid will not be asked to indicate how many of their current residents had some or all of their services paid for by Medicaid in the last 30 days. The web and CATI system incorporates inter-item consistency checks and other edit checks during data collection and eliminates the need to enter data from a hard copy questionnaire, thereby reducing data entry errors and improving data quality.

There are no technical or legal obstacles to burden reduction.

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

Over the past decade or so, a number of federally and privately funded efforts have been initiated to address data needs about RCCs and ADSCs. These efforts do not duplicate the current study, but provided important building blocks for, complement, and have been used to inform and guide the design of the RCC and ADSC survey components of NSLTCP.

### Select Prior RCC Studies

*Compendium of Residential Care and Assisted Living Regulations and Policy: 2015 Edition* ASPE provided funding to RTI International to update a 2007 compendium on assisted living that is referenced below. (Carder, O'Keeffe, and O'Keeffe, 2015).

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

### (OMB No. 0920-0912, Expires: 07/31/2016)

NCHS funded the collection of data needed to develop an up-to-date sampling frame of stateregulated RCCs in the United States for the 2012 and 2014 cycles of NSLTCP. Data for the sampling frame that will be used to draw a nationally representative sample for the 2016 RCC survey component of NSLTCP was collected in 2015.

### National Survey of Residential Care Facilities

## (OMB No. 0920-0780, Expired: 12/31/11)

NCHS and the Office of the Assistant Secretary for Planning and Evaluation (ASPE) sponsored this national survey of residential care in 2010. NSRCF was an in-person establishment-based nationally representative sample survey of U.S. assisted living and other residential care communities. The methodology used to develop the 2009 NSRCF frame and the eligibility definition of a RCC used for the 2010 NSRCF are also used in NSLTCP. Selected benchmark questions from the 2010 NSRCF are included in NSLTCP to enable comparisons and trending.

### Select Prior ADSC Studies

## Regulatory Review of Adult Day Services: Final Report, 2014 Edition

ASPE provided funding to RTI International to develop a state regulatory compendium on adult day services providers. (O'Keeffe, O'Keeffe, and Shrestha, 2014).

### The Metlife National Study of Adult Day Services, 2010

The Metlife Mature Market Institute collaborated with the National Adult Day Services Association (NADSA) and The Ohio State University of Social Work to conduct this study. Survey data were collected and analyzed from a nationally representative sample of ADSCs, focusing on the characteristics of ADSCs and a profile of ADSC participants. This survey was conducted in 2010 with plans to conduct it again in the future. NCHS used the questionnaire items for this study to inform its development of NSLTCP survey items, to enable selected comparisons and trending for ADSCs with this study.

### Adult Day Services: A Key Community Service for Older Adults, 2006

The purpose of this ASPE-funded study was threefold: (1) to inform policymakers about the current and potential role of adult day services (ADS) in the health care and long-term care systems as determined by state regulation; (2) to identify operational and regulatory issues facing ADS providers under different ADS models and in different regulatory and financing environments; and (3) to provide information that can guide future research and policy analysis on ADS for elderly persons generally and on medically-oriented ADS specifically (O'Keeffe and Siebenaler). The study methods used included: (1) an in-depth review of state approaches to regulating ADS (Siebenaler et al., 2005); (2) consultation with a Technical Advisory Group, subject experts, state regulatory and Medicaid staff, and state provider associations; and (3) site visits to ADS providers in five states: Georgia, Illinois, Maryland, North Carolina, and Washington.

Survey data from the ADSC and RCC components of NSLTCP: (1) give DHHS a database that complements other surveys; (2) fill a significant data gap on two major sectors of the LTC industry; and, (3) along with administrative data that NCHS is obtaining for three other LTC sectors (nursing homes, home health agencies, hospices), help provide a more complete picture of the supply and use of the major paid, regulated LTC providers in the United States. NSLTCP will enable analyses on a range of issues of interest to federal and state policymakers, researchers, consumers, and providers.

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

A number of RCC communities and ADSC centers could be considered small businesses. In order to minimize burden, the number of items contained in the data collection questionnaires has purposely been held to the minimum required to describe the provider and resident/participant characteristics of RCCs and ADSCs. Specifically, the most recent NHHCS (2007) averaged about 8 hours and the 2012 NSRCF averaged about 3 hours, both of which were in-person surveys. By contrast, the ADSC and RCC mail/web/telephone surveys for NSLTCP

will take on average 30 minutes to complete. Further, mail and web data collection modes allow RCC and ADSC directors to complete the questionnaires when it is most convenient for their schedules. This is particularly valuable for directors of small communities/centers, where the director is more likely than in larger communities/centers to be spending time providing direct care to residents/participants. For respondents who complete by telephone interview, CATI staff will be flexible and adjust to the time constraints of the directors and staff members in all RCCs and ADSCs, including small communities/centers. Administrative burden will be reduced in smaller communities/centers because they have fewer residents/participants and are likely to know their residents/participants better than larger RCCs/ADSCs.

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

The NSLTCP survey is intended to be conducted every two years; so far, the survey has been conducted in 2012 and 2014. Surveying ADSCs and RCCs every two years is a reasonable frequency to enable trending over time while not burdening respondents with more frequent data collection. This is a request for clearance to allow NCHS to conduct the 2016 NSLTCP.

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

The data collection will be implemented in a manner consistent with 5 CFR 1320.5; however, there is one special circumstance that applies to collection of NSLTCP data. NSLTCP collects OMB race and ethnicity codes in as much detail as possible, but RCCs and ADSCs vary in the extent to which and how they record race and ethnicity information. We collect race and ethnicity in the OMB format to the extent that it is possible. The approach uses a set of mutually exclusive and exhaustive categories. The categories are similar to those collected by the National Center for Education Statistics (NCES), and reflect the sets of guidelines on classification of federal data on race and ethnicity and aggregate race and ethnicity reporting provided on the OMB website: <a href="http://www.whitehouse.gov/omb/inforeg\_statpolicy#dr">http://www.whitehouse.gov/omb/inforeg\_statpolicy#dr</a>. We take this approach because the responding RCCs and ADSCs vary in record keeping practices and in the forms they use for reporting resident/participant demographics (i.e., non-standard reporting). The only category that we add but is not in the NCES approach is "some other category reported in this community's/center's system." This has been added to accommodate those providers' forms that do not have all of the standard race categories and may have recorded race as "other".

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

The 60-day notice soliciting comments on this data collection project named National Study of Long-Term Care Providers was posted on November 10, 2015 (Vol. 80, No. 217, pages 69677-69679). A copy of the Federal Register notice can be found in Attachment B. No comments were received.

Consultation outside the agency includes:

1. Since 2011, NCHS has routinely outreached to other agencies and organizations to aid in the development of NSLTCP. For example, NCHS has sought input to wording of selected question items by representatives from organizations such as the office of the

Assistant Secretary of Planning and Evaluation within DHHS and provider membership associations such as the National Center for Assisted Living, LeadingAge, and the National Adult Day Services Association (NADSA). NCHS has given presentations to raise awareness of and promote participation in the survey components of NSLTCP at provider associations meetings, such as those by NADSA and the Argentum (formerly the Assisted Living Federation of America).

- 2. Since 2011, letters of support for the survey component of NSLTCP have been obtained from associations that represent RCCs and ADSCs (Attachments E-2-E-5, F). We have sought and obtained letters of support from the following organizations:
  - Argentum (formerly the Assisted Living Federation of America)
  - American Seniors Housing Association (ASHA)
  - Center for Excellence in Assisted Living (CEAL)
  - LeadingAge (formerly the American Association of Homes and Services for the Aging)
  - National Adult Day Services Association (NADSA)
  - National Association of States United for Aging and Disabilities (NASUAD)
    - National Center for Assisted Living (NCAL)
  - 3. Since 2011, NCHS has routinely engaged in outreach activities with RCC and ADSC provider associations. NCHS has met multiple times with NADSA and CEAL board members to promote participation. The main goals of these meetings have been to solicit information from them on 1) best practices for recruiting communities and centers to participate in NSLTCP and 2) ways we can collaborate to inform their respective provider memberships about the importance of NSLTCP. Representatives of RCC and ADSC professional associations have continued to work with NCHS to raise awareness of NSLTCP using selected communication channels with their provider members (e.g., association newsletters, websites).
  - 4. Since 2011, NCHS has identified administrative data from CMS to provide information on provider and user (aggregated at the provider level) characteristics for nursing homes, home health agencies, and hospices. Since 2012, NCHS has worked with appropriate CMS offices to obtain provider- and user-level administrative data for nursing homes, home health care agencies and hospices.

### 9. Explanation of Any Payments or Gifts to Respondents

There will be no payments or financial gifts to respondents.

### **<u>10. Protection of the Privacy and Confidentiality of Information Provided by Respondents</u></u>**

This submission has been reviewed for Privacy Act applicability by the NCHS Privacy Act Officer and it has been determined that the Privacy Act does not apply as data on individuals are not being collected. All procedures and methods for maintaining confidentiality have been reviewed and approved by NCHS' Confidentiality Officer, when necessary.

The information collected will be used exclusively for statistical purposes and will be kept

confidential.

Confidentiality protection will be applied to the 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."

The data collection components of NSLTCP will be conducted by NCHS' contractor using a solid and well-established Enhanced Security Network (ESN), which is certified and accredited at the Federal Information Processing Standard Publication 199 (FIPS 199) moderate level for confidentiality, integrity, and availability. Standard access security features inside the ESN include user identification and password lockout of accounts upon repeated entry of an invalid password, New Technology File System (NTFS) file- and directory-level security, periodic backups, anti-virus software, and administrator-defined user groups. Only project staff that have signed the necessary confidentiality agreements and received the appropriate training will be permitted access to the project files and directories.

NCHS's contractor will set up a public-facing interface to the ESN to allow self-administered web surveys to be accessible without sacrificing confidentiality. The protocol will be to send a randomly generated username and password along with the URL for the survey. Establishments that elect to take the web-based survey will use these credentials to connect to a web site outside of the ESN to take the survey. All response data will be stored in the ESN, and establishments will have access only to their own survey, and only using the credentials supplied to them.

Surveys may be broken off and resumed later, but once the establishments have finalized and completed their survey, the credentials will be deactivated.

Community/Center data will be treated in a confidential manner so that individual communities/centers cannot be identified. The process of informing respondents of the procedures used to keep information confidential begins with materials mailed to RCCs/ADSCs (see Attachments E-1 through E-5 and F). Materials include specific references to protections of the confidentiality of the information. These materials also emphasize and detail procedures intended to keep information confidential by the data collectors.

NSLTCP includes respondent contact materials that will inform the RCC/ADSC director of the purpose and content of the study (see Attachments E-1 through E-5). In addition to explaining the confidentiality of the information provided and voluntary participation, the letter includes a reference to the legislative authority for the study, and an explanation of how the data will be used. This letter also emphasizes that data collected about the RCCs/ADSCs and their residents/participants will never be linked to their names or other identifying features. If necessary, a package will be mailed to corporate offices of RCCs/ADSCs that are part of a chain of communities/centers. Attachment F contains the materials to be included in the chain package. The chain package materials will serve to inform corporate office staff about the study so that if communities/centers say that they need permission to participate, the corporate office will have knowledge of the study.

## **<u>11.</u>** Institutional Review Board (IRB) and Justification for Sensitive Questions

### **IRB** Approval

According to the NCHS Human Subjects Contact, this data collection does not meet the definition of human subjects research as stated in 45 CFR 46.102(f). (Attachment G).

### Sensitive Questions

Items on the NSLTCP questionnaire are not sensitive in nature. Data collected will not include protected health information or personal identifiers. Study protocols and questionnaires do not contain questions about sensitive issues, such as sexual preferences or attitudes, or about potentially illegal behaviors, such as use of illicit drugs. Nor do we ask about religious preferences or beliefs.

Since NSLTCP does not involve collecting protected health information (e.g., personal identifiers such as name, social security number, birth date, or Medicare/Medicaid numbers), the survey is not subject to the Privacy Rule, mandated by the Health Insurance Portability and Accountability Act (HIPAA).

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

### A. Burden Hours

Table 1 includes the average annual burden for data collection over the two year clearance. We calculated the burden based on a 100% response rate. Approximately, 11,690 RCCs and 5,400 ADSCs in 50 states and the District of Columbia will be targeted in the survey. Expected burden from data collection is 30 minutes on average for respondents. The RCC annualized burden for data collection is 2,924 hours; for ADSCs it is 1,350 hours. We estimate that 5% of RCC and ADSC directors (585 RCC and 270 ADSC respondents) will be called for data retrieval when there are errors or omissions in their returned surveys for a total of 36 annualized hours of burden. The total estimate of annualized burden is 4,310 hours.

Type of Respondent	Form Name	Number of Respondents	Number of Responses	Average Burden/ Response (in minutes)	Response Burden (in hours)
RCC Director/Designated Staff Member	RCC Questionnaire- Version A	2,923	1	30/60	1,462
RCC Director/Designated Staff Member	RCC Questionnaire- Version B	2,923	1	30/60	1,462
ADSC Director/Designated Staff Member	ADSC Questionnaire- Version A	1,350	1	30/60	675
ADSC Director/Designated Staff Member	ADSC Questionnaire- Version B	1,350	1	30/60	675
RCC and ADSC Directors/Designated Staff Members	Data Retrieval	428	1	5/60	36
Total					4,310

#### Table 1: Estimated Annualized Burden Table

## B. Cost to Respondents

The only cost to respondents is their time. The estimated annualized cost for the national survey is \$215,208 (Table 2).

Type of respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
RCC Director/ Designated Staff Member	2,924	\$49.84	\$145,732
ADSC Director/ Designated Staff Member	1,350	\$49.84	\$67,284
RCC/ADSC Director/ Designated Staff Member	36	\$49.84	\$1,794
Total			\$214,810

### Table 2: Estimated Annualized Costs for Data Collection

Information on RCC and ADSC directors' hourly wage rates gathered from the Bureau of Labor Statistics' website, and can be accessed at the following link: http://www.bls.gov/oes/current/oes119111.htm

## **<u>13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers</u></u>**

There are no additional costs.

### **<u>14. Annualized Cost to the Federal Government</u>**

The estimated total annualized cost to the Government is \$1,089,446 shown in Exhibit 1.

### Exhibit 1: Estimated Annualized Costs to the Government

Item/Activity	Details	\$ Amount
NCHS Staff	Cost for staff and supplies	\$231,615
Contractor	Field staff costs, including data collection costs and other direct	\$857,831
	costs	
Estimated Total Cost		\$1,089,446

### **15. Explanation for Program Changes or Adjustments**

This submission serves as a reinstatement with change. The previously approved version included 19,371 respondents and 8,936 hours with a one year approval. This version seeks a two year approval, and includes 8974 respondents and 4,310 burden hours, a decrease of 316 hours.

## **16. Plans for Tabulation and Publications and Project Time Schedule**

OMB clearance is requested for a period of two years. Major milestones and the corresponding due dates are shown in Exhibit 2.

Exhibit 2: Ma	ajor Milestones	and Planned Dates
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Major NSLTCP Milestones	Due Dates
Draw RCC and ADSC samples for 2016 NSLTCP	04/2016
2016 NSLTCP Fielding Begins	1 month after OMB approval
Train 2016 CATI Interviewers	3-4 months after OMB approval
2016 NSLTCP Fielding Ends	8 months after OMB approval
2016 ADSC and RCC Restricted Survey Data Files	12 months after fielding ends
Complete	
Overview Report, Data Briefs, State Estimates, National	12-18 months after fielding
Weighted Survey Estimates, Trend Report Complete	ends

For both the ADSC and RCC 2016 survey components of the NSLTCP, RDC restricted data files with no identifiers and no linking information are planned to be made available. Since we are planning to release state level estimates and state is a sampling stratum, as done with the 2012 and 2014 waves, the NCHS Disclosure Review Board advised against public-use data files. Any restricted NSLTCP data will be made available through NCHS' Research Data Center (RDC). The current target goal schedule for releasing the (1) survey-based RDC restricted files and (2) reports referenced in the last row of Exhibit 2 will be in late 2017-early 2018. Please go to <a href="http://www.cdc.gov/nchs/nsltcp/nsltcp\_products.htm">http://www.cdc.gov/nchs/nsltcp/nsltcp\_products.htm</a> to access RDC restricted files and products from the 2012 and 2014 waves of NSLTCP.

### **<u>17. Reason(s) Display of OMB Expiration Date is Inappropriate.</u>**

The display of the OMB expiration date is not inappropriate.

## 18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions to the certification. **References** 

- Carder, O'Keeffe, and O'Keeffe. (2015). Compendium of Residential Care and Assisted Living Regulations and Policy: 2015 Edition. Washington, DC: US Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: <u>http://aspe.hhs.gov/pdf-report/compendium-residential-care-and-assistedliving-regulations-and-policy-2015-edition</u>.
- Hawes, C., Phillips, C.D., & Rose, M. (2000). A national study of assisted living for the frail elderly: Final report. Prepared for the U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, Office of Disability,

Aging, and Long-Term Care.

- Komisar, H. and Feder, J. (2011). Transforming Care for Medicare Beneficiaries with Chronic Conditions and Long-Term Care Needs: Coordinating Care Across All Services. The SCAN Foundation. Available at: http://www.thescanfoundation.org/sites/default/files/Georgetown\_Trnsfrming\_Care.pdf
- Mollica, R. Sims-Kastelein, K. and O'Keeffe, J. (2007). Residential Care and Assisted Living Compendium: 2007. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: http://aspe.hhs.gov/daltcp/reports/2007/07alcom.htm
- Mollica, R.L., & Johnson-Lamarche, H. (2005). State residential care and assisted living policy: 2004. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: http://aspe.hhs.gov/daltcp/reports/04alcom.pdf.
- Mollica, R., (2004, January). Typology for residential places. Presentation at the Expert Meeting on Typology of Long-Term Care Residential Places, National Center for Health Statistics, Silver Spring, MD.
- Mollica R. 2002. State Assisted Living Policy: 2002. National Academy of State Health Policy. Portland, Maine.
- O'Keeffe, O'Keeffe, Shrestha. (2014). Regulatory Review of Adult Day Services: Final Report, 2014 Edition. Washington, DC: US Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: <u>http://aspe.hhs.gov/basic-report/regulatory-review-adult-day-services-final-report-2014edition</u>
- O'Keeffe, J. and Siebenaler, K. (2006). Adult Day Services: A Key Community Service for Older Adults. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: http://aspe.hhs.gov/daltcp/reports/2006/keyADS.pdf
- Siebenaler, K., O'Keeffe, J., O'Keeffe, C., Brown, D. and Koetse, B. (2006). Regulatory Review of Adult Day Services: Final Report. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation. Available at: http://aspe.hhs.gov/daltcp/reports/adultday.pdf
- Spillman, B., & Black, K. (2005). *The size of the long-term care population in residential care: A review of estimates and methodology*. Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation.