**Information Collection Request**

**GenIC**

**BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples For the National Center for Chronic Disease Prevention and Health Promotion**

Submitted under

**CDC/ATSDR Formative Research and Tool Development**

**(OMB #0920-1154)**

**Supporting Statement: Part A**

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**LIST OF ATTACHMENTS**

Attachment 1: BRFSS Data Collection Protocols

Attachment 2: Recruitment Text for Respondents to Participate in the BRFSS Feasibility Experiment

Attachment 3: Invitation Scripts for Text, Email and Mail

Attachment 4: Questionnaire Content of the BRFSS Feasibility Experiment

**Supporting Statement: Summary**

* Goal of the Proposed Project: The purpose of the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be to assess whether out-of-state cell phone respondents for the Behavioral Risk Factor Surveillance System (BRFSS) will complete state-specific modules on the web after completion of the common core questionnaire. Currently, such respondents are not included in state-specific modules. Results will be used to inform future data collection methodologies of the BRFSS
* Intended use of the resulting data: Data may be used to determine whether changes can be made to telephone survey methods to divert some respondents to a web-based portion of a questionnaire, currently in use.
* Methods to be used to collect data: This feasibility experiment will assess three methods for inviting respondents to complete state-specific modules. The respondents who complete the core will be randomly assigned to one of three invitation methods to complete modules: (1) an SMS text link, (2) a URL link within an email, or (3) a postal mail of the URL for the state-specific modules. Based on their randomized condition, the invitation to the state-specific module survey will be sent via SMS text link, email, or mail to each of the recruited participants.

The CDC will track responses, cooperation and completion rates and characteristics of both respondents and nonrespondents to the state-specific modules to determine whether it is feasible to move respondents from telephone based data collection to web-based questionnaires.

* Populations to be studied: Adult residents of 10 US states who are part of the BRFSS sample.
* How data will be analyzed: The resulting data will be used to test whether a follow-up for cooperating respondents could result in an approach for collecting state-specific data that is currently not collected. If data indicate that it is cost effective to implement a procedure for new methods to achieve module data, changes may be made in future BRFSS data collection methods.

**A. Justification**

# 1. Circumstances Making the Collection of Information Necessary

The Centers for Disease Control and Prevention (CDC) requests that the Office of Management and Budget (OMB) approve a generic clearance under CDC/ATSDR Formative Research and Tool Development (OMB #0920-1154) for the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples. Currently, cell phone respondents whose phone numbers place them in state samples, but whose residence is outside the state sample frame, are only asked the common core questions of the BRFSS. This has resulted in a larger-than-acceptable percentage of missing data for questions on modules selected by state health departments to determine population estimation of health risk behaviors, health status and preventive testing. Currently, it is not known what proportion of respondents who have completed the core questionnaire would be willing to complete additional modules online, or if different methods of invitation would influence cooperation. Since these respondents have completed the core module, they would be expected to have high response propensities, however, since respondents will be asked to switch modes, the method of invitation may influence these propensities. This test will provide information on how additional state-specific module data might be collected.

The Behavioral Risk Factor Surveillance System (BRFSS) is the nation's premier system of health-related telephone surveys that collect state data about U.S. and territorial residents regarding their health-related risk behaviors, chronic health conditions, and use of preventive services. Established in 1984 with 15 states, BRFSS now collects data in all 50 states as well as the District of Columbia and three U.S. territories. BRFSS completes more than 400,000 adult interviews each year, making it the largest continuously conducted health survey system in the world.

The BRFSS sample includes telephone numbers using landline and cell phones. In 2017, approximately 56% of all interviews were conducted on cell phones. Overall about 8% of all cell phone interviews reach a respondent who resides in a different state. However, in some states the percentages can be much higher, at 15-20% of all interviews. This results in a large proportion of missing data elements for questions on modules which are specific to their state of residence. To date, no efforts have been made to re-contact out-of-state cell phone respondents. As the proportion of cell phone respondents within the sample grows, the problem will become more acute and result in a larger number of interviews without module data. Although cell phone sampling procedures are improving the rate of accuracy, the loss of these responses is a serious concern for state health departments which count on the data from modules to allocate resources, evaluate and plan programs within their states.

# 2. Purpose and Use of Information Collection

The BRFSS is continually striving to provide valid population-level health information using the most cost-effective and least burdensome method. This feasibility test will determine whether it is possible to follow-up with out-of-state cell phone respondents to collect state-specific data. The data collected from the experiment will not be used for population estimation nor will these data appear in the public use BRFSS datasets.

This is an efficient test of the potential to follow up with cell phone respondents in that it will use the current BRFSS sample and no BRFSS data will be lost. Respondents will be recruited after completion of the current practice of terminating the interview after the core, common questionnaire. However, module data from the feasibility experiment will not be incorporated into data used for population estimation.

The purpose of the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be to test whether a follow-up for cooperating respondents could result in an approach for collecting state-specific data that is currently not collected. Information derived from the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be used for the following purposes:

1. Determination of cooperation and response rates to the state-specific modules for each invitation method.
2. Assessment of the quality of data collected between the three follow-up procedures.
3. Evaluation of differences in responses (including item refusal, demographic comparisons and health outcomes) between those who complete modules on the phone and those who complete the online modules using a follow-up procedure.
4. Evaluation of the demographic differences of respondents who complete modules on the phone and those who complete the online modules using a follow-up procedure.
5. Production of methodological paradata on times of day web-based questionnaires are accessed, protocols for reminding respondents to complete follow-up questions and costs associated with follow-up recruitment.
6. Comparison of difference in experimental outcomes by state. This will include nominal comparisons among responses, but not include prevalence estimation.

For both purposes 3 and 4 above, we recognize the confounding between within-state telephone module respondents and experimental out-of-state groups. Comparisons will be informative of the potential for the state-specific data to affect estimates when combined with state matched telephone data. Since all respondents invited to the state-specific modules will have completed the core, we will make comparisons for respondent compositions between respondents and nonrespondents to the state-specific modules.

Figure A.2 illustrates the protocols for completion of the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples.



No data from the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be used for population prevalence estimation or rigorous analysis of health data.

Overall results will be used to assess methods for improved data quality and efficiency in the data collection process. The practice of testing modes and protocols for data collection is standard for all large-scale data collection systems such as the BRFSS and other data collection systems housed within the NCCDPHP. This experiment will provide the first information on feasibility of collecting module data for out-of-state residents, and if feasible, which invitation method is best. It is currently unknown whether the proportion of respondents completing the state-specific modules will be sufficient to merit the new procedures and development of online state-specific instruments. Results from the experiment will direct further experimentation in BRFSS data collection protocols.

# 3. Use of Improved Information Technology and Burden Reduction

Computer Assisted Telephone Interview (CATI) software, web-based questionnaire software and other software programs will be used to facilitate the interview process and reduce the time burden on respondents during BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples when appropriate. The state-specific modules will include appropriate skip pattern programming to reduce the time necessary to complete the questionnaire (see Attachment 4).

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

Work carried out under this clearance will be designed to address the needs of the NCCDPHP and is not duplicative of other evaluation or test known.

# 5. Impact on Small Businesses or Other Small Entities

This effort will not have any impact on small businesses or other small entities.

# 6. Consequences of Collecting the Information Less Frequently

The BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples is a one-time data collection request.

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

No special circumstances apply.

# 8. Comments in Response to the Federal Register Notice/Outside Consultation

**Section 8A:**

As required be 5 CFR 1320.8(d), a 60-day Federal Register Notice was published in the *Federal Register* for CDC/ATSDR Formative Research and Tool Development (OMB #**0920-1154)**

**Section 8B:**

Westat will be used as a contractor for all texted invitations, mailings, website development and hosting, and data collection. Westat will also store databases during the duration of the test.

# 9. Explanation of any Payment/Gift to Respondents

No incentives/payments will be provided to respondents.

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

In the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples, general demographic characteristics of respondents from the core questionnaire will be matched to the online state-specific module questionnaire using a login ID provided in the invitation to participate. The Feasibility Experiment will not collect demographic information directly. According to the standard BRFSS Data Collection Protocols (see Attachment 1), respondents’ phone numbers will be kept in separate files and will be securely stored. After completion of the feasibility experiment, sample files will be destroyed. Addresses will be retained only for purposes of mailing invitations to participate.

**How Information Will Be Shared and For What Purpose**

BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples summary reports will be provided to state health departments who are partners in the BRFSS. Ten states have volunteered to participate (TX, AK, FL, WV, MO, WA, NY, KY, CT, and ND). Information in summary form may be used for presentations on methodology, but combined datasets from participating states will not be provided. Individual state health departments will retain data from their states with the above mentioned privacy of address and phone number protocols. Results may also be used to prepare and present methodological research papers at professional conferences or for peer reviewed journals. No data from the feasibility test will be used to produce prevalence estimates or analyze public health status.

**Impact of the Proposed Collection on Respondents’ Privacy**

The BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples files will include phone numbers and/or addresses. CDC will not retain any individually identifiable information and will not maintain sample files of phone numbers or addresses. Sample files will be kept separate from response files and will not be connected to responses. They will be stored in secure locations and destroyed at the end of the feasibility test.

**How Individuals Are Informed That Providing Information Is Voluntary Or Mandatory**

Individuals participating in the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be voluntarily recruited and will be reminded that they may refuse to answer specific questions. In all tests where a telephone interview is conducted, protocols for voluntary screening will be used that match current procedures for the BRFSS (approved under OMB No. 0920-1061). Attachment 2 provides script for recruitment to participate in the feasibility experiment. The state-specific questionnaire will also inform respondents of the voluntary nature of the data collection in the introduction to the survey (see example language in Attachment 4).

**Opportunities to Consent**

Verbal consent is obtained from participants during the initial contact (see Attachments 2 and 4). Introductory scripts, including the voluntary nature of the survey, will precede the online survey questions.

**How Information Will Be Secured**

Access to the data set will be limited to CDC, a state health department and/or its designated contracted vendor conducting the test. Access to data for the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples will be limited to the program staff members who review the administration and the state health departments (and their designated vendors) collecting the data. Security measures include: 1) Physical controls: CDC facilities are secure, ID accessed buildings. Data will not be stored in hard copy formats; and 2) Technical controls: All electronic data are stored on secured servers protected with firewalls and passwords. All employees are trained on data security measures by taking appropriate HHS courses. All data collection and records management practices and systems adhere to HHS and CDC IT policies and procedures.

Privacy Act Determination

The sample and data collection protocols for the telephone interview portion of the test will be identical to those of the BRFSS (OMB No. 0920-1061). The Privacy Act does not apply to the BRFSS since no IIF will is collected, filed or retrieved by the name of the individual or other unique respondent identifier such as social security number. The sampling protocols for this test only differ in that respondents must provide addresses, emails or allow texts in order to participate. Files with this information will not be stored with any responses and will be destroyed after use.

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

The questions to be included in the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples are general questions on health status, health risk behaviors and preventive practices. These questions are included in the feasibility experiment to ensure that the respondents will complete questions which normally are asked of in-state respondents completing the questionnaire on the phone. These questions have previously received OMB approval under the BRFSS (OMB No. 0920-1061). BRFSS Protocols also receive IRB approval under Protocol #2988.

# 12. Estimates of Annualized Hour and Cost Burden

Table 12A shows the estimated annualized burden hours of the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples. We anticipate 10 states to participate (TX, AK, FL, WV, MO, WA, NY, KY, CT, ND) with up to 1,500 completes per mode of invitation. The actual number of participants will be determined by the ability to recruit participants and by the number of participants who follow-through after recruitment. The experiment will not exceed the numbers in Table 12A and will likely be substantially fewer. There will be a single data collection, with up to three invitations to participate (see Attachment 3).

12A. Estimated Annualized Burden (Hours)

|  |
| --- |
| Table 1. Respondent Burden by Type of Information Collected |
| Type of Respondents | Type of Information Collection | Number of respondents per IC | Annualized number of respondents | Average burden per response (in hours) | Total annualized burden hours |
| General U.S. Adult Population | State-specific modules using SMS (text) invitation  | 1,500 | 1,500 | 20/60 | 500 |
| State-specific modules using email invitation | 1,500 | 1,500 | 20/60 | 500 |
| Modules using USPS Mailed invitation | 1,500 | 1,500 | 20/60 | 500 |
| Total  |  | 4,500 | 4,500 | 20/60 | 1500 |

 **12B**. **Costs to respondents.**

No costs to Feasibility Experiment respondents are anticipated, other than their time to participate. Table 12B shows the estimated cost burden for the single administration of the experiment, based on the respondent’s time to participate (approximately 20 minutes, inclusive of time needed to access the questionnaire). Burden is estimated at the average hourly earnings rate ($27.48) for each respondent and for the maximum number of 4,500 respondents in the table below. The total maximum cost burden is estimated to be $41,220.

**Estimated Annualized Burden Costs**

|  |
| --- |
| Table 12B Estimated Annual Cost Burden |
| Respondent Type |  Burden Hours | Average Hourly Rate\* | Total Cost Burden |
| RDD Sample |
| State-specific module questionnaire single administration | 20/60 | $27.48 | $9.16 |
| Total for 4,500 respondents | 1500 | $27.48 | $41,220 |

\*Based upon the average hourly earnings from the Current Employment Statistics survey conducted by the Bureau of Labor Statistics (available at <https://www.bls.gov/news.release/empsit.t19.htm> )

# 13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There are no direct costs to respondents other than their time.

# 14. Annualized Cost to Federal Government

Annualized Estimated Cost to the Federal Government

|  |  |
| --- | --- |
| Estimated funds provided to states | 0 |
| Estimated CDC BRFSS budget | $185,275 |
| Total | $185,275 |

# 15. Explanation for Program Changes or Adjustments

N/A.

# 16. Plans for Tabulation, Publication, and Project Time Schedule

The following timeline approximates the schedule for the BRFSS Feasibility Experiment for State-specific Module Data Collection in Cell Phone Samples:

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
|  | Month 1 | Month 2 | Month 3 | Month 4 | Month 5 | Month 6 | Month 7  | Month 8 | Month 9 |
| Recruit states |  |  |  |  |  |  |  |  |  |
| Recruit subjects |  |  |  |  |  |  |  |  |  |
| Create website |  |  |  |  |  |  |  |  |  |
| Coordination with state systems |  |  |  |  |  |  |  |  |  |
| Collect data |  |  |  |  |  |  |  |  |  |
| Data analyses and reporting |  |  |  |  |  |  |  |  |  |

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

Not applicable.

# 18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the PRA.