Generic Information Clearance for CDC/ATSDR Formative Research and Tool Development Determination of Attitudes Regarding Noise in Construction

Supporting Statement A

November 15, 2019

Contact Information:

Bryan Beamer CDC/NIOSH/DFSE/EPHB 513-533-8308 zmy4@cdc.gov

Table of Contents

Section

A. Justification

- 1. Circumstances Making the Collection of Information Necessary
- 2. Purpose and Use of the Information Collection
- 3. Use of Improved Information Technology and Burden Reduction
- 4. Efforts to Identify Duplication and Use of Similar Information
- 5. Impact on Small Businesses or Other Small Entities
- 6. Consequences of Collecting the Information Less Frequently
- 7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5
- 8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency
- 9. Explanation of Any Payment or Gift to Respondents
- 10. Protection of the Privacy and Confidentiality of Information Provided to Respondents
- 11. Institutional Review Board (IRB) and Justification for Sensitive Questions
- 12. Estimates of Annualized Burden Hours and Costs
- 13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers
- 14. Annualized Cost to the Federal Government
- 15. Explanation for Program Changes or Adjustments
- 16. Plans for Tabulation and Publication and Project Time Schedule
- 17. Reason(s) Display of OMB Expiration Date is Inappropriate
- 18. Exceptions to Certification for Paperwork Reduction Act Submissions

Attachments

Attachment 1: Authorizing Legislation

Attachment 2: In-Depth Interview (IDI) Guide: Construction Industry Executive/Decision-Maker In-Depth Interviews

Attachment 3: Moderator's Guide: Construction Supervisor/Foreman Focus Group

Attachment 4: Moderator's Guide: Construction Workers Focus Groups

Attachment 5: Moderator's Guide: Construction Workers Focus Groups (Spanish Version)

Attachment 6: Non-research determination

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Centers for Disease Control and Prevention (CDC) National Institute for Occupational Safety and Health (NIOSH) requests a 1-year approval for a generic information collection titled Determination of Attitudes Regarding Noise in Construction. The information collection supports an already-awarded contract with Hannon Group, LLC to conduct a marketing study aimed at improving attitudes about workplace noise on construction sites.¹ This project will ultimately encourage the use of noise controls and other best practices to protect workers from workplace noise.

Background

This data collection is intended to support the National Occupational Research Agenda (NORA) project of the National Institute for Occupational Safety and Health (NIOSH) Noise and Bioacoustics Team entitled 'Developing, Evaluating and Promoting Noise Control Solutions.'

As stated in the NORA proposal, key objectives include the following:

Increase Motivation to Implement Noise Control Strategies:

- Conduct market analysis aimed at identifying motivating factors, benefits, and barriers to implementation
- Identify and promote the economic benefits of implementing noise control interventions

Optimize Dissemination of Information about Interventions

 Work with targeted stakeholders [in focus groups] to determine their preferred content format and method of delivery

These goals are based on important needs as articulated in the NORA proposal, which includes the following:

- A critical gap in understanding the benefits of implementing noise control solutions. The
 proposed research will make these benefits clear through example cost-benefit analyses,
 using worker compensation claims data to expose the hidden costs of non-implementation,
 and conveying the health-related outcomes of creating a quieter workplace.
- A lack of noise control literature designed for consumption by equipment users, maintenance technicians, safety professionals, and decision makers. This research targets these audiences by identifying preferred content format and method of delivery.
- A lack of understanding (on the part of researchers) of the perceived barriers to implementing engineering noise control interventions. This project addresses this gap by conducting [focus groups] aimed at identifying and overcoming barriers to implementation of noise control interventions.

Furthermore, this contract is based on recommendations found in Section 8.0 of the Social Marketing Planning Outline developed during fall 2018 by the Hannon Group, LLC. Those recommendations were based on the intelligence Hannon Group gathered and analyzed for the *Noise Control Solutions for Construction Workers: Environmental Scan* submitted September 19, 2018, as well as the primary research *In-Depth Interview report, Protecting Construction Workers' Hearing Health – Noise Control Solutions: Barriers and Opportunities* submitted November 30, 2018.

2. Purpose and Use of Information Collection

The purpose and use of this information collection are for the contractor, Hannon Group, LLC to assist and advise NIOSH project officers in:

- Enhancing awareness of construction site noise as a worker health issue (the primary goal)
- Increasing concern about, and commitment to protecting, worker hearing health

- Improving regular and correct use of hearing protection by construction workers
- Facilitating greater interest in and action around "engineering out" noise in the construction environment
- Facilitating greater interest in and action around buying and using quieter construction equipment/tools

3. Use of Improved Information Technology and Burden Reduction

Participants in this study will be asked questions: 1) on a one-on-one basis in in-depth interviews; or 2) as part of a focus group. Regarding Information Technology and Burden Reduction, the in-depth interviews will be conducted using web-enabled, telephone technology.

4. Efforts to Identify Duplication and Use of Similar Information

The marketing firm, Hannon Group, LLC conducted a thorough literature search regarding attitudes among stakeholders in the construction industry in previous research conducted for the NIOSH Noise and Bioacoustics Team - *Noise Control Solutions for Construction Workers: Environmental Scan*; as well as the report *In-Depth Interview report, Protecting Construction Workers' Hearing Health – Noise Control Solutions: Barriers and Opportunities*. As part of those reports, Hannon Group, LLC determined that there was no available or existing data regarding attitudes among stakeholders in the construction industry regarding the implementation of noise controls.

5. Impact on Small Businesses or Other Small Entities

There are three groups of participants who will be asked questions in this study: *Group A*: Construction Company Owners/Senior Executives and Equipment Purchasing Decision-Makers; *Group B*: Construction Supervisor/Foremen; and *Group C*: Construction Workers. Group A participants will participate via a web-enabled telephone interview. Each interview will take place at the convenience of the participants and not take more than 30 minutes. Group B and C participants will be included in 90-minute focus groups. All participants in each group will be asked to participate at a time that is convenient and will have a minimal impact upon their business.

6. Consequences of Collecting the Information Less Frequently

Participants in this study will only be participating on a one-time basis. This is believed to be sufficient for the contractor conducting the study, Hannon Group, LLC, to make recommendations regarding ideal information delivery mechanisms for raising stakeholder awareness of impact of construction equipment/tool noise on workers' health and well-being.

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 Agencies

The Federal Register notice was published for this collection on July 18, 2016, Vol. 81, No. 137, pp. 46680. No public comments were received.

9. Explanation of Any Payment or Gift to Respondents

We propose different incentives for volunteers based on whether they are participating in-person in Focus Groups or In-Depth Interviews:

- In-Depth Interview Participants to receive gift certificates for the amount of \$75 per person
- Focus Group Participants to receive gift certificates for the amount of \$75 per person

While it is true that the that incentives would not typically exceed \$40 per hour, we have taken into account that focus group participants will have to travel and this will require extra time and travel expense. Also in-depth interviews will take place with participants who make a high hourly salary and who will have to respond to intensive one-on-one questioning.

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

The NIOSH Information Systems Security Officer has determined that the Privacy Act does not apply. The contractor, Hannon Group, LLC will be contacting respondents who are already in their databases. Pre-existing information about the respondents will be used to contact potential respondents regarding their availability to participate. Basic, pre-existing information that will be used by Hannon Group to establish respondent's availability includes:

- Name
- Mailing Address
- Phone Numbers
- Email Address

Additionally, some pre-existing, private information which is already contained in Hannon Group, LLC's databases will be reported in summary form as part of the summary data in the final report:

- Employment Status
- Ethnicity
- Age Category

To be clear, all data is pre-existing in Hannon Group, LLC's databases and will not be reported to NIOSH except in summary form (basic summary information about Employment Status, Ethnicity and Age Category).

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

IRB Approval

This project underwent an IRB review as part of the contract proposal process. At that time it was determined that this project is not research as "the purpose of the activity is to prevent or control disease or injury and improve health, or to improve a public health program or service." (See Attachment 6—IRB Non-research Determination).

Sensitive Questions

There are no sensitive questions within this proposed project.

A.12. Estimates of Annualized Burden Hours and Costs

The annualized response burden is estimated at 82 hours. These will include interviews, and focus groups as follows: 20 individual interviews of 30 minutes each and 4 total focus group sessions with 12 persons per group.

Exhibit A.12.A Annualized Burden Hours

Type of Respondent	Form Name	Number of Participants	Number of Responses per Respondent	Average Hours Per Response	Total Response Burden (Hours)
Group A: Construction Company Owners/Senior Executives and Equipment Purchasing Decision- Makers	In-Depth Interviews	20	1	30/60	10
Group B: Construction Supervisor/ Foremen	Focus Group	12	1	1.5	18
Group C: Construction Workers	Focus Group	36	1	1.5	54
Total					82

A.12.B Estimated Annualized Costs

The United States Department of Labor, Bureau of Labor Statistics data were used to estimate the hourly wage rate for the purpose of this generic request.

- "Construction Managers": https://www.bls.gov/oes/current/oes119021.htm#nat
- "First-Line Supervisors of Construction Trades": https://www.bls.gov/oes/current/oes471011.htm
- "Construction Trades Workers": https://www.bls.gov/oes/current/oes_nat.htm#11-0000

Exhibit A.12.B. Annualized Cost to Respondents

Activity – Data	Total Burden Hours	Hourly Wage	Total Respondent
Collection		Rate	Cost
Group A: Construction Company Owners/Senior Executives and Equipment Purchasing Decision- Makers	10	\$49.57	\$496
Group B: Construction Supervisor/ Foremen	18	\$33.91	\$610
Group C: Construction Workers	54	\$21.54	\$1,163
		Total	\$2,269

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

CDC does not anticipate providing start up or other related costs to private entities.

A.14. Annualized Costs to the Government

Expense Type	Expense Explanation	Annual Costs (dollars)
Direct Costs to the Federal Government		
	CDC Project Officer (GS-12/13, 0.25 FTE)	\$20,320
	Subtotal, Direct costs	\$20,320
	TOTAL COST TO THE GOVERNMENT	\$20,320

A.15. Explanation for Program Changes or Adjustments

This is a new generic information collection.

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

Once data collection is cleared for this project the following time schedule will be kept:

- 1. Recruitment and Start of Data Collection (1 month total)
- 2. Recruitment and Continued Data Collection (1 month total)
- 3. Completion of Data Collection (2 months total)
- 4. Delivery of Final Report (1 month total)

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

The display of the OMB expiration date is not inappropriate.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

1	'Protecting Construction Workers' Hearing Health Noise Control Solutions: Barriers and Opportunities - Results from Interviews with Construction and Government Sector Stakeholders' submitted to NIOSH by Hannon Group, LLC on November 30, 2018 as part of Procurement Request #: 000HCCGD-2018-226216				