ADMINISTRATION ON COMMUNITY LIVING

STATE HEALTH INSURANCE ASSISTANCE PROGRAM (SHIP) CUSTOMER SATISFACTION SURVEY

REQUEST FOR OMB APPROVAL

SUPPORTING STATEMENT, AS REQUIRED UNDER THE PAPERWORK REDUCTION ACT AND 5 CFR 1320

Background

The State Health Insurance Assistance Program (SHIP) is a national program that offers one-on-one assistance, counseling, and education to Medicare beneficiaries, their families and caregivers to help them make informed health benefits decisions. Through federal grants directed to states, SHIPs provide a community –based network of volunteer and paid counselors that offer free education and assistance via telephone, face-to-face interactions, group presentations, other public events, and media. SHIPs provide unique, personal, and in-depth assistance that is not replicated under any other federal program.

The SHIP Customer Satisfaction Survey is the first nationwide survey of its kind. The purpose of the survey is to measure satisfaction with SHIP Medicare counseling services, to assess how customers value the services and information they receive, to identify opportunities for continuous improvement, and to comply with regulatory requirements regarding data collection and continuous improvement. This effort is part of the SHIP network's commitment to provide the best possible service to its customers. This survey is a baseline data collection effort.

A. Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Section 301 of the Public Health Service Act [1] (42 U.S.C. § 241) is the authorizing law for data collections within the Department of Health and Human Services (HHS). Specifically, agencies within HHS should "collect and make available through publications and other appropriate means…research and other activities."

[1] Attachment 1: Section 301 of the Public Health Service Act

The March 3, 1998 White House Memorandum, "Conducting Conversations with America to Further Improve Customer Service[2]," directs agencies "to track customer service measurements, then take necessary actions to change or improve how the agency operates, as appropriate. Integrate what your agency learns from its customers with your agency's strategic plans, operating plans, and performance measures required by the Government Performance and Results Act of 1993, reporting on financial and program performance under the Chief Financial Officers Act of 1990, and the Government Management Reform Act of 1994."

Executive Order (E.O.) 12862[3] (September 11, 1993) is aimed at "ensuring the Federal Government provides the highest quality service possible to the American people." The E.O. discusses surveys as a means for determining the kinds and qualities of service desired by the Federal Government's customers and for determining satisfaction levels for existing service. These voluntary customer surveys will be used (1) to ascertain customer satisfaction with individuals receiving information from State Health Insurance Assistance Program (SHIP) counselors and (2) to report on annual performance goals as described in the Government Performance Results Act Modernization Act of 2010 (GPRAMA). These results are used internally, and summaries are provided to the Office of Management and Budget (OMB) on an annual basis and are used to satisfy the requirements and spirit of E.O. 12862.

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

The information obtained from this survey will be used by federal and regional employees of the Administration for Community Living (ACL), part of the Department of Health and Human Services. Specifically, the information will be used to assess customer satisfaction with SHIP Medicare counseling services. The results of the survey will be used to assess the need for overall agency improvements, including the reallocation of resources, revisions to certain agency processes and policies, and/or development of guidance related to the agency's customer services. The results of the survey could also lead to improvements for Medicare beneficiaries, as improved customer service by the agency will lead to more appropriate Medicare choices for individual citizens, leading to monetary savings for both the individual and the SHIP program. Ultimately, these changes could improve the services ACL provides to the public.

[2] Attachment 2: Memorandum on Conducting Conversations with America to Further Improve Customer Service
[3] Attachment 3: Executive Order (E.O.) 12862

In addition, ACL will use this data to fulfill the requirements of the Government Performance and Results Modernization Act of 2010 (GPRAMA; Pub.L. 111-352). The GPRA Modernization Act requires ACL to report annually on their progress towards achieving specific performance goals. Results from this survey will help to determine new performance goals and assess existing goals.

3. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

This survey does not involve the use of electronic collection techniques, such as an internet-based survey. However, ACL will use computer-assisted telephone interviewing (CATI) software to ensure consistency in the interviews, increase the response rate, and improve the survey experience. In addition, use of ACL's SHIP National Performance Reporting (NPR) data system to collect consumer information such as counseling topic (enrollment, prescription drug coverage, etc.) and method of interaction (phone, in-person, etc.) improves potential respondent identification and reduces the length of the survey, thereby limiting the burden on individual respondents.

A telephone survey is the best option for the respondent universe. SHIP pilot tested the telephone surveys with nine individuals, and was able to confirm that accessing respondents by phone is the preferred methodology. In addition, SHIP's NPR system allows for easy access to telephone contact information, allowing SHIP to sample participants with appropriate contact information prior to beginning survey administration.

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

This effort does not duplicate any other survey collection by HHS, ACL, or any other federal agency. ACL has not previously conducted a data collection related to the satisfaction of consumers with SHIP Medicare counseling experiences. Since a survey of this program has never been conducted redundancy will not be an issue with this data collection.

5. **If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

This information collection has no impact on small businesses or other small entities.

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

Without this information collection, ACL will not be able to measure satisfaction with SHIP Medicare counseling services and will be limited in its ability to implement improvements. Assessing how customers value the services and information they receive will allow for the development of program enhancements. In addition, ACL would not be able to meet the legal requirements pertaining to data collection and continuous improvement, including the March 3, 1998 White House Memorandum, E.O. 12862, and GPRAMA (Pub.L. 111–352).

7. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**
   - **requiring respondents to report information to the agency more often than quarterly;**
   - **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
   - **requiring respondents to submit more than an original and two copies of any document;**
   - **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
   - **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
   - **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
   - **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
   - **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection of information is consistent with 5 CFR 1320.5(d)(2), and there are no special circumstances with respect to reporting.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting**

comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-Day Federal Register Notice was published in the Federal Register on June 28, 2016, vol. 81, No. 124; pp 41974-41975[4]. There were no public comments.

A 30-Day Federal Register Notice was published in the Federal Register on November 8, 2016, vol. 81, No. 216; pp 78601-78602. There were no public comments.

In addition to internal consultation, ACL worked with nine (9) individuals to verify the language and length of the survey instrument. These included state directors from Ohio, California, and Florida, who responded to the survey as a part of the survey development process. Next, ACL contacted six (6) individuals who had received SHIP Medicare counseling to also complete a survey as a part of the survey development process. All nine (9) of the above individuals participated in a telephone interview format where they were able to give feedback on the survey instrument and suggest changes. The three (3) state directors not only provided feedback on the survey itself, but also on the survey process, including the accuracy of NPR reporting system data and the ability to generate weekly data at two points each year. Feedback from the nine (9) individuals involved in pilot testing helped to finalize the survey instrument and process that have been submitted for OMB approval.

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

The Agency will not provide payment or other forms of remuneration to participants.

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

[4] Attachment 4: 60-day Federal Register Notice - Vol. 81, No. 124; pp 41974-41975

Personally identifiable information (PII) – including name and phone number – needs to be collected to identify and contact a representative sample of survey respondents. Once sensitive PII is no longer needed (i.e., after these individuals have been contacted), then all PII and sensitive information will be removed from the database. Any files that include PII or other types of sensitive information will be transmitted via encrypted email. This will either include the installation of encrypted software on computers designated for transmission of sensitive information, or the use of password-protected files to transmit PII, with the password sent in a separate email message.

Furthermore, ACL will assign respondents with a unique, but anonymous, identifier once they either complete the survey or decline to respond to it. Such anonymization will protect respondents' PII while the survey is being administered. At the conclusion of the survey effort, all remaining PII will be destroyed.

In addition to protecting PII, ACL will explain to individual respondents the need for and value of this data collection, as well as the methods used to maintain confidentiality.

11. **Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent**.

No questions will be asked that are of a personal or sensitive nature as defined by OMB.

12. **Provide estimates of the hour burden of the collection of information. The statement should:**
    - *** Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
    - ***<u>* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.</u>***

- *** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

For this project, ACL will collect data twice per year, sampling counseling sessions that occurred during the previous week. This will allow ACL to collect data during both the open enrollment period (October 15 – December 7) and a non-enrollment period (spring/summer). For example, ACL would pull a list of all counseling sessions that occurred between March 27, 2017 and April 2, 2017 on April 3, 2017. Calls to the sampled population would then begin on April 5, 2017. ACL expects to collect 75 responses per state/territory over the two periods, with approximately half (37) in the non-enrollment period, and the other half (38) in the open enrollment period. Given that the average state/territory has over 1,000 counseling events each week, there will be sufficient data to achieve the response goal in either period.

ACL will sample without replacement each period, but will aggregate data for the entire year, meaning that no individual respondent will be asked to participate more than once per year. This methodology must be used in order to obtain a representative sample.

Each year, ACL expects to obtain a total of 1,350 completed surveys for a random sample of individuals receiving SHIP Medicare counseling services, with each survey response requiring 8 minutes to complete. The target number of 1,350 is a result of 18 states/territories each generating 75 completed surveys in a single year. The 75 surveys were chosen as a means to:

a. Make comparisons between states, and
b. Maximize individual state data collections within budgetary constraints.

The survey will be repeated over three years until all states/territories have been surveyed.

The time estimate of eight (8) minutes is based on research performed by ACL with the existing survey instrument, including pilot tests with three (3) State Directors of SHIP programs and six (6) individuals who had received SHIP Medicare counseling. The 1,350 number divided 60 minutes, multiplied by eight (8) minutes results in a figure of 180 burden hours each year to complete this collection.

Of the 1,350 surveys, all responses will come from individuals who had received Medicare counseling services from the local SHIP program. Because there are no specific expectations in terms of employment status or experience, all 1,350 individuals will be charged at the rate for "All Occupations," which is $23.23/hour, as defined by the Bureau of Labor Statistics' "Occupational Employment Statistics." This number is increased by a factor of 100% to account for benefits and overhead.

As a result, ACL estimates an approximate aggregate cost to respondents of $8,393. This estimate is based on the per hour valuations of respondents' time seen above and the projected 180 burden hours.

The 1,350 completed surveys will correspond with a random sample of unique (i.e., non-redundant) individuals who received SHIP Medicare counseling. One week's worth of counseling data will be obtained twice per year. Historical data indicates that on average each state/territory enters approximately 1,000 counseling events into NPR each week. Since only 18 states/territories will be sampled each year of the survey, there should be a final population of approximately 18,000 respondents (18 states/territories x 1,000 counseling sessions per state/territory) available for sampling at two points each year.

ACL will then use a random sampling method to select individual cases for survey response. The complete estimated annualized burden can be seen in Table A-12-1:

Table A-12-1. Total Estimated Annualized Burden Hours [1]			
Number of Respondents	**Responses per Respondent**	**Average burden hours per response (hrs.)**	**Total Burden Hours**
1,350	1	8/60	180

[1]The Department of Labor, Bureau of Labor Statistics, website was used to determine appropriate wage rates for respondents (see Table A-12-2).

Table A-12-2. Estimated Annualized Cost to Respondent for the Hour Burdens		
Total Burden Hours	**Hourly Wage Rate [2]**	**Total Respondent Costs**
180	$23.23 x 2	$8,362.80

[2] Source: U.S. Department of Labor, Bureau of Labor Statistics. Based on median hourly rates for occupations closest to each category of respondent. Available at: http:// http://www.bls.gov/oes/current/oes_nat.htm

13. **Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).**

ACL identifies no capital, start-up, or maintenance of capital costs associated with this proposed collection of information.

14. **Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

This survey project will occur over a three-year period. Major fluctuations in cost are not expected. Specifically, ACL expects the survey's contractor costs to be approximately $145,000 annually. This amount includes all costs related to reporting, survey administration, survey development, and communication between the contractor and ACL. Contractor hour estimates are based on previous survey projects conducted by the contractor, including similar projects for HHS. Hourly labor charges are based on existing Mission Oriented Business Integrated Services (MOBIS) rates. The loaded rates for the contractor staff involved with this project vary from $150/hour to $285/hour.

In addition, the ACL employees participating in this effort will add an additional $69,952.40 to the annual cost burden, making the total cost to the government $214,952 per year. Table A-14-1 provides the cost analysis per FTE.

Table A-14-. Estimated Cost Analysis per FTE [3]			
Grade	Hours	Rate	Total Cost
GS 15	104	$86.95	$9,042.80
GS 14	104	$73.91	$7,686.60
GS 14	104	$73.91	$7,686.60
GS 13	416	$62.55	$26,020.80
GS 13	312	$62.55	$19,515.60
Total	1040	N/A	$69,952.40

[3] Source: OPM 2016 Salary Table (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DCB_h.pdf). All Grades are listed at Step 5 and include an additional 25% for benefits.

15. Explain the reasons for any program changes or adjustments.

This is a new data collection.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A combination of 18 states and/or territories will be surveyed each year, and each state/territory will receive a report summarizing their results at the end of the year in which they are surveyed. Annual summary results will be provided to ACL along with that year's 18 state/territory reports.

At the conclusion of the three-year cycle, a national report, which summarizes results across all 54 states and territories, will be created. This national report will also evaluate answer frequency, question correlation, and overall program performance.

Assuming this project has been approved and is ready to begin in August, 2017, the following timeline would be applicable. Aany shifts to the approval date will have a corresponding impact on the dates listed in Table A-16-1, which will be updated once OMB clears this survey effort:

Table A-16-1: SHIP Survey Project Time Schedule

Survey Phase	#	Task	2017	2018	2019
Preparation	1	Announcement letter sent to 18 states/territories selected for survey	9/25	9/24	9/23
	2	Survey training	10/2	10/1	9/30
	3	Pilot test sampling process	10/16-11/17	10/15-11/16	10/14-11/15
Administration	4	Pull counseling records (i.e.,	12/4	12/3	12/2

		establish sample) for Round 1			
	5	**Round 1 Calls Start Date**	12/6	12/5	12/4
	6	**Round 1 Calls End Date**	12/11	12/10	12/9
	7	**Round 1 Data Collection**	12/15	12/14	12/13
	8	**Pull counseling records (i.e., establish sample) for Round 2**	3/12	3/11	3/10
	9	**Round 2 Calls Start Date**	3/14	3/13	3/12
	10	**Round 2 Calls End Date**	3/19	3/18	3/17
	11	**Round 2 Data Collection**	3/23	3/22	3/21
Analysis	**12**	**Data Analysis Start**	3/26	3/25	3/24
	13	**Data Analysis End**	4/20	4/19	4/18
Reporting	**14**	**Report Creation Start**	4/23	4/22	4/21
	15	**Report Creation Delivery**	5/16	5/15	5/14
	16	**Report Briefing**	5/23	5/22	5/21

In each year, Tasks 1-3 would prepare the states/territories for survey administration. Next, Tasks 4-11 will focus on obtaining survey responses. Then, Tasks 12-13 will involve analyzing survey response results. Lastly, Tasks 14-16 include reporting activities that will occur at the end of each year.

Analysis of the program nationally, including state-to-state comparisons, would begin during the first week of January 2020 (January 6, 2020). A national summary report should be prepared and ready for delivery to ACL by February 19, 2020. The report will be used for internal program management purposes. At this time ACL does not plan to make the report public. Data will be shared with individual state grantees for program development purposes.

In order to administer the survey appropriately, states and territories will be responsible for uploading counseling information into ACL's NPR System the week preceding the sampling pull dates (Tasks 3, 4, and 8). While all states/territories are required to enter counseling information into NPR, not all of the states/territories enter this information on a daily or weekly basis. For those states who enter information less frequently, a pilot session (Task 3) has been established prior to the first round of sampling and survey calls.

Additionally, state/territory counselors will be expected to notify the individual receiving SHIP Medicare counseling that a record of the interaction will be collected and that a third party might contact the counselee to assess their satisfaction with their counseling session.

Once a round of counseling session records has been captured and uploaded to NPR, the records will be pulled on the following Monday in order to establish the sample (Tasks 4 and 8). With the sample established, calls will begin on Wednesday (Tasks 5 and 9) and will conclude after 5 days of calling (Wednesday – Sunday; Tasks 6 and 10).

ACL funds a resource center through a grant that serves as a central source of information, expertise, and technical assistance for the SHIP grantee projects by disseminating material through webinars, newsletters, listservs and a website that has a password protected component for SHIP programs, and also a public facing site where information can be shared with the public. It is through this resource center that results and best practices learned from this data collection will be disseminated.

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

ACL will notify respondents that this is an approved collection and will identify the OMB approval expiration date, the OMB control number, and the duration of the survey during the introductory script.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.