

ADMINISTRATION ON COMMUNITY LIVING

*SENIOR MEDICARE PATROL (SMP)
CUSTOMER SATISFACTION SURVEY***REQUEST FOR OMB APPROVAL****SUPPORTING STATEMENT, AS REQUIRED UNDER THE PAPERWORK REDUCTION ACT
AND 5 CFR 1320****Background**

The Senior Medicare Patrol (SMP) is a grant program that funds projects that actively work to disseminate fraud prevention and identification information through the media, outreach campaigns, community events and also working with beneficiaries who present with complex cases such as compromised Medicare numbers. Through these efforts, beneficiaries contact the projects with inquiries and complaints regarding Medicare, Medicaid and other health care or related consumer issues.

This effort is part of the SMP network's commitment to provide the best possible service to customers. This survey is a baseline data collection effort that will help the network gain more insight into how customers experience SMP presentations. SMP expects the survey results to highlight what positively impacts presentation attendees and identify opportunities for improvement.

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.”

The March 3, 1998 White House Memorandum, “Conducting Conversations with America to Further Improve Customer Service²,” 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

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

² Attachment 2: Memorandum on Conducting Conversations with America to Further Improve Customer Service

the Chief Financial Officers Act of 1990, and the Government Management Reform Act of 1994.”

Executive Order (E.O.) 12862³ (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 with existing services. These voluntary customer surveys will be used (1) to ascertain customer satisfaction with individuals attending Senior Medicare Patrol (SMP) presentations and (2) to report on annual performance goals as described in Government Performance Results Act (GPRA; Pub.L. 103-62)-related documents. 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 SMP presentations on fraud, waste, and abuse. The results of the survey could lead to 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 SMP program. Ultimately, these changes could improve the services ACL provides to the public.

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.

³ Attachment 3: Executive Order (E.O.) 12862

This survey does not involve the use of electronic collection techniques, such as an internet-based survey. Letter-size (8.5" x 11") comment cards with large font types for easy review and visibility will be distributed to participants at the conclusion of randomly selected SMP presentations, where attendees will have the opportunity to voluntarily complete a survey. The ability to provide instant feedback on-site reduces the need for an electronic survey instrument. Instant feedback, voluntary participation, and a customized survey instrument will increase response rates and provides the best method for obtaining representative responses.

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 performed any data collections related to satisfaction with SMP presentations. This is the first time ACL is conducting a satisfaction survey related to the SMP program, so 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 would not be able to measure satisfaction with SMP presentations and would 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 the GPRA Modernization Act of 2010 (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 29, 2016, vol. 81, No. 125; pp 42360-42362.⁴ 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 78599-78600. There were no public comments.

⁴ Attachment 4: 60-day Federal Register Notice - , vol. 81, No. 125; pp 42360-42362.

Aside from internal consultation, ACL worked with nine (9) individuals to verify the language and length of the survey instrument. ACL's survey team – which included regional staff and volunteers, plus contractor assistance, attended group education sessions in Pennsylvania and Connecticut. The team worked with state/territory directors to understand and observe a typical education session and test the process for announcing the survey and gathering feedback. In Pennsylvania, ACL's survey team was able to collect completed responses from four (4) individuals who had attended the education session, and in Connecticut the survey team collected responses from five (5) education session attendees. The opportunity to deliver feedback was announced by ACL's survey team immediately following the education session, and interested participants were given letter-size (8.5" x 11") comment cards to complete. A member of the survey team was available to answer questions, but did not read each question aloud or walk participants through the survey. This approach was chosen to create a realistic survey environment. Once each participant completed his/her survey, ACL's survey team asked for general impressions and what changes (if any) the participants would like to make. Feedback from these nine (9) individuals helped us 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.

In addition to complying with these legislative standards, ACL will also take steps to explain to individual respondents the need for and value of this data collection. No confidential or personal identifiable information (such as name or phone number) is associated with this information collection. Respondents will be informed of this fact during the survey announcement at each group education session.

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.**
- *** 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.**
- *** 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 throughout the year, until an individual state/territory has obtained 75 responses from education session presentations. To ensure that the responses are representative of the larger population, ACL has determined specific criteria regarding how many events can be sampled. These include:

- Surveying a specific site no more than once.
- Surveying at least five unique (i.e., non-redundant) presenters in each state/territory.
- Surveying no fewer than five events and no more than 20 events in each state/territory.
- Surveying no more than two events per month in each state/territory.

Because ACL does not schedule a year's worth of events in advance, and typically only schedules events 2-3 weeks prior to their start date, ACL cannot apply a typical sampling methodology to this survey. However, the criteria above will limit the ability of individual locations or presenters to bias the overall results.

Each year, ACL expects to obtain an average of 1,325 completed surveys of customers that have attended a SMP Outreach Event. These completed surveys will represent a random sample of individuals attending group education sessions, with each survey response requiring 5 minutes to complete. This time estimate is based on research performed by ACL with the existing survey instrument, including pilot tests with nine (9) individuals who attended SMP group education sessions.

The target number 1,325 is a result of 53 states/territories, each generating 75 completed surveys over three years ($53 \times 75 = 3,975$). Averaging the total collection over three years generates the annual average of 1,325 responses ($3,975/3 = 1,325$). Multiplying the 1,325 by 5 minutes ($5/60$) results in a total of 110.4 burden hours per year to complete this data collection.

Seventy-five (75) surveys per state/territory were chosen as a means to:

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

The survey will be repeated over three years until all states/territories have been surveyed. Eighteen (18) states/territories will be surveyed in Year 1 and Year 2, and 17 states/territories will be surveyed in Year 3.

All survey responses will come from individuals who attended education sessions presented by the local SMP program. Because there are no specific expectations in terms of employment status or experience, all 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, resulting in a rate of \$46.46/hour.

As a result, ACL estimates an approximate aggregate cost to respondents of \$2,565 each year. This estimate is based on the per hour valuations of respondents’ time noted above and the projected 110.4 burden hours.

The average number of 1,325 completed surveys will correspond with the number of individuals volunteering to complete a survey at select education events. The complete estimated, annualized burden can be seen in Table A-12-1:

Number of Respondents	Responses per Respondent	Average burden hours per response	Total Burden Hours
1,325	1	5/60	110.4

The Department of Labor website was used to determine appropriate wage rates for respondents (see Table A-12-2).

Total	Hourly Wage Rate*	Total Respondent Costs
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Burden Hours		
110.4	\$46.46	\$5,129.18

*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://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 has not identified any 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 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 \$124,000 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. 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.

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

⁵ 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.

GS 13	312	\$62.55	\$19,515.60
Total	1,040	N/A	\$69,952.40

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

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 53 states and/or territories will be surveyed over three years. In Year 1, 18 states/territories will be surveyed. In Year 2, 18 states/territories will also be surveyed. In Year 3, 17 states/territories will be surveyed. Each state/territory will receive a report summarizing their results at the end of the year in which they are surveyed. In addition, annual summary results will be provided to ACL along with that year's 17 or 18 state/territory reports.

At the conclusion of the three-year cycle, a national report which summarizes results across all 53 states and territories will be created. This national report will also evaluate answer frequency, question correlation, and overall program performance. At this time, ACL does not plan to make this national report public, but will supply states/territories with an analysis of their individual performance, and how that performance compares to national averages.

In addition, ACL will update each of the states/territories surveyed in a given year on the number of surveys collected per Month, and their compliance with the established criteria on the Monthly Status Check dates (Tasks 6-10). Assuming this project has been approved and is ready to begin on July 1, 2017, the following timeline would be applicable (any shifts to the approval date will have a corresponding impact on the dates listed in Table A-16-1):

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

Survey Phase	#	Task	Year 1	Year 2	Year 3
Preparation	1	Announcement letter sent to states/territories selected for survey	9/25/17	9/24/18	9/23/19
	2	Survey training	10/9/17	10/8/18	10/7/19

Administration & Analysis	3	Begin surveying events	10/16/17	10/15/18	10/14/19
	4	Data Analysis and Event Tracking Starts	10/16/17	10/15/18	10/14/19
	5	Data Analysis and Event Tracking Ends	3/30/17	3/29/18	3/28/19
	6	Status Check 1: November	11/6/17	11/5/18	11/4/19
	7	Status Check 2: December	12/4/17	12/3/18	12/2/19
	8	Status Check 3: January	1/15/17	1/14/18	1/13/19
	9	Status Check 4: February	2/12/17	2/11/18	2/10/19
	10	Status Check 5: March	3/12/17	3/11/18	3/10/19
Reporting	11	Report Creation Start	4/2/18	4/1/19	3/31/20
	12	Report Creation Delivery	5/2/18	5/1/19	4/30/20
	13	Report Briefing	5/9/18	5/8/19	5/7/20

Aside from providing each state/territory with training at the beginning of the year (Task 2), ACL will track events throughout the year to ensure that each state/territory is effectively applying the identified criteria to the survey process. ACL will also use a rolling process to collect data throughout the year and provide technical assistance as needed (Tasks 4-5).

Blank surveys will be made available at the conclusion of pre-selected group education sessions, and attendees will have the ability to voluntarily complete comment card surveys with the OMB control number presented at the top of the page. SMP presenters will notify attendees about the opportunity to complete a survey and will distribute surveys to the participants on a voluntary basis. These steps will be taken to maintain anonymity in the survey process. SMP presenters will be available to answer questions or provide assistance if requested, but will not otherwise interact with the respondents while they are completing the surveys. If a potential respondent requires special assistance, such as the presenter reading

the questions aloud, the presenter will be available to do so, but will not supply or suggest answers to the respondent.

All materials related to survey completion (comment cards and pencils) will be provided by the ACL presenter. After the event, ACL will scan and send the completed surveys to a third-party contractor. The contractor will collect and aggregate the survey results, which will assist with ACL's ongoing provision of technical assistance and the Quarter 1, Quarter 2, and Quarter 3 Status Checks.

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 display OMB's expiration date on the survey. ACL will notify respondents that this is an approved collection and will identify the OMB approval expiration date on the survey

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.