Supporting Statement A for Paperwork Reduction Act Generic Information Collection Submissions for
"ASPE Generic Clearance for the Collection of Qualitative Research and Assessment"

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. The Office of the Assistant Secretary for Planning and Evaluation (ASPE) at the Department of Health and Human Services (HHS) is requesting a generic clearance for purposes of conducting qualitative research to gain a better understanding of emerging health and human services policy issues, develop future intramural and extramural research projects, and to ensure HHS leadership, agencies, and offices have current data and information to inform program and policy decision-making. We seek to obtain OMB approval of a generic clearance to collect qualitative data on HHS programs and policy issues. By qualitative feedback we mean information that provides useful insights on perceptions and opinions, but are not statistical surveys that yield results that can be generalized beyond the population of study.

This collection of information is necessary to enable HHS/ASPE to receive feedback in an efficient, timely manner, in accordance with our mission to identify health and human services policy issues from key external stakeholders. ASPE's mission is to advise the Secretary of the Department of Health and Human Services on policy development in health, disability, human services, data, and science, and provides advice and analysis on economic policy. ASPE leads special initiatives, coordinates the Department's evaluation, research and demonstration activities, and manages cross-Department planning activities such as strategic planning, legislative planning, and review of regulations. Integral to this role, ASPE conducts research and evaluation studies, develops policy analyses, and estimates the cost and benefits of policy alternatives for HHS related programs.

Qualitative research and assessment are the main objectives of the activities included in this clearance. The goal of developing these activities is to identify emerging policy issues and research gaps to ensure the successful implementation of HHS programs. The participants will include policy experts; national, state, and local health representatives; human service, behavioral health, and healthcare providers; and representatives of other health organizations.

2. Purpose and Use of the Information Collection

The information collected for qualitative research and assessment will be used by ASPE to develop future intramural and extramural research projects and to inform emerging health policy issues for HHS leadership, agencies, and offices. The purpose is to obtain broad and diverse perspectives on public health, human service, and health care issues to understand emerging issues, promising practices by innovative programs or organizations funded by HHS,. The data

collected under this clearance will be published only if it is of methodological interest or if the data suggest more study is necessary.

ASPE will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current programs, policies, and services. Under this clearance a variety of qualitative methods will be used, and the exact nature of the questions and samples is currently undetermined, and ASPE expects that they will include but not be limited to issues related to human services policy issues; healthcare such as, healthcare financing and delivery issues, prevention, public health issues, health information technology; workforce issues related to healthcare, human services, or research. The qualitative methods employed will vary based on the issue being examined; however, in the previous three years of this generic mechanism, we have used key informant interviews the most. The information collected will provide insights into stakeholder perceptions, experiences and expectations; provide an early warning or serve as a barometer of policy issues; or focus attention on areas where communication, training or changes in operations might improve delivery of services or program implementation. These collections will allow for ongoing, collaborative and actionable communications between HHS/ASPE and its appropriate stakeholders. If this information is not collected, vital feedback from stakeholders on the HHS policy and program issues will be unavailable or available in a very limited way (fewer than ten respondents). In the past three years of using this mechanism we have improved our understanding of specific issues and in targeted populations that has driven further research or analysis.

The Agency will only submit a collection for approval under this generic clearance if it meets the following conditions:

- Information gathered will be used internally for generating and identifying policy issues and research gaps to ensure successful implementation of HHS programs. Some information may not be for release outside of the agency, and it information is released, procedures outlined in Question 16 will be followed in accordance with HHS policy;
- Information gathered may not directly inform influential public policy decisions as defined by OMB. Information may also inform the development of ASPE's future intramural and extramural research projects, which could in turn inform influential public policy decisions[1];
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the broader population;
- The collections are voluntary;
- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the federal government;
- The collections do not raise issues of concern to other federal agencies;

[1] As defined in OMB and agency Information Quality Guidelines, "influential" means that "an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions."

- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide renumeration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) is collected only to the extent necessary and is not retained.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the normal PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the focus group guide). OMB will respond to the submission with questions or approval within 14 business days, or as appropriate given the nature of the submission.

The types of collections that this generic clearance covers include, but are not limited to:

- Interviews
- Small discussion groups
- Focus Groups of stakeholders
- Questionnaires
- Other qualitative methods: other qualitative methods that ASPE typically uses such as, document studies, performance assessments, and case studies.

HHS/ASPE has established a manager/managing entity to serve for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

3. Consideration Given to Information Technology

ASPE does its best to ensure we are requiring the least amount of burden when collecting information from the public. To the extent possible, we always strive to collect information electronically and/or use online collaboration tools to reduce burden.

4. Duplication of Information

ASPE collaborates and coordinates routinely with all parts of HHS and other federal agencies. We do our best to ensure no similar data are gathered or maintained by other parts of HHS or are available from other sources known to us. To the extent possible, ASPE collaborates with internal and external partners to ensure there is not duplication of information collected. This information collection does not duplicate any other qualitative research methods being conducted by ASPE or at HHS in general. ASPE typically looks at cross-cutting issues that may involve several agencies within HHS to provide a departmental view and coordination. This

clearance will improve the quality of ASPE's policy research and assessment as well as providing a more efficient means for conducting more rigorous qualitative policy research and assessment. To the maximum extent possible, we will make use of previous information by reviewing results of previous qualitative research projects on relevant policy issues before we attempt to revise interview guides, questionnaires, and other tools using additional field work sought under this clearance.

5. Reducing the Burden on Small Entities

Small business or other small entities may be involved in these efforts but ASPE will minimize the burden of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments whenever possible.

6. Consequences of Not Conducting Collection

This clearance involves the use of qualitative research to inform policy research and assessments for dynamic public health, human service, and healthcare issues, changing trends in population health, and new health threats. If we do not continue this mechanism, ASPE will be limited in its ability to solicit feedback from broad and diverse policy experts and stakeholders, impacting our ability to provide up-to-date information from external stakeholders to HHS leadership.

7. Special Circumstances

There are no special circumstances. The information collected will be voluntary and will not be generalizable.

8. Consultations with Persons Outside the Agency

In accordance with 5 CFR 1320.8(d), on April 28, 2017, a 60-day notice for public comment was published in the *Federal Register* (Vol. 82, No. 81 Page 19740). No comments were received.

9. Payment or Gift

ASPE will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. If it becomes evident that remuneration is necessary, and if ASPE will provide $40 or less per respondent for in-person information collection, ASPE will include a statement to this effect and any other associated documentation as necessary in information collection requests under this mechanism. If evidence suggests that it is necessary to provide remuneration in excess of $40 per respondent, ASPE will provide a statement to this effect and will provide justification in the form of empirical evidence that the specified remuneration is necessary.

10. Confidentiality

ASPE does not anticipate the Privacy Act will apply to any of our data collections under this generic mechanism. If the Privacy Act applies to a collection, ASPE will provide a Privacy Act statement, SORN, or any other associated documentation as necessary. If a confidentiality pledge is deemed useful and feasible, the Agency will include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge. Most of the information collections under this mechanism have not collected personally identifiable information or information of a personal or sensitive nature.

11. Sensitive Nature

No questions will be asked that are of a personal or sensitive nature.

12. Burden of Information Collection

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (1,500) are based on the number of collections we expect to conduct over the requested period for this clearance and based on the previous three years. To calculate the annualized burden to respondents, we initially assumed that 160 contracts will be issued over a 3-year period. This assumption is based on the number of contracts ASPE issued for FYs 2014-2017. We chose to calculate the average number of contracts over a three year period since the number of contracts varies from year to year. We estimate that 70% of our contracts (112) will use one of the types of qualitative research methods included in this clearance request. We estimate that there will be 20 respondents per instrument totaling 2,240 estimated respondents over a three year period. Therefore, we anticipate 747 estimated respondents annually. Based on our experience with this mechanism, many of the activities were done outside the confines of a contract, and we are reached the estimate of 747 burden hours per year. With the current interest in this mechanism and a focus on expanding our intramural policy research portfolio, combined with major potential policy changes as a result of a new administration, we anticipate that this mechanism will be used more than it has in the prior years therefore we are significantly increasing the annual burden request to 2,000 annual burden hours.

Estimated Annual Reporting Burden				
Type of Collection	No. of Respondents	Annual Frequency per Response	Hours per Response	Total Hours
Interviews, focus groups, questionnaires, and other	2,000	1	1	2,000

qualitative methods				
Total	**2,000**			**2,000**

13. Costs to Respondents

No costs are anticipated.

14. Costs to Federal Government

The anticipated cost to the federal government is approximately $600,000 annually, for a total of 1.8 million over the period of three years. These costs are comprised of: operational expenses (e.g., equipment, overhead, printing, and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance.

15. Reason for Change

With the current interest in this mechanism and a focus on expanding our intramural policy research portfolio, combined with major potential policy changes as a result of a new administration, we anticipate that this mechanism will be used more than it has in the prior years therefore we are doubling the annual burden request to 2,000 annual burden hours.

16. Tabulation of Results, Schedule, Analysis Plans

Information collected under this generic clearance provides useful information, but it does not yield data that can be generalized to the overall population. Findings may be disseminated when appropriate, strictly following the HHS "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of the qualitative results discussed above. ASPE may also receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests), and we will comply with those requests as appropriate.

17. Display of OMB Approval Date

We are requesting no exemption.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.