**Supporting Statement A**

**Title of the Data Collection**

**OMB Control No. 0915-0387**

**Terms of Clearance:** For revisions, extensions, or reinstatements list terms of clearance here. Explain how the terms of clearance are addressed in the submission. **If there were no terms of clearance, please state “None”.**

**A. Justification**

1. **Circumstances Making the Collection of Information Necessary**

The Health Resources and Services Administration (HRSA)’s Federal Office of Rural Health Policy (FORHP) is requesting OMB approval to collect information on grantee activities and on extension of current performance measures electronically through the HRSA Electronic Handbook (EHB). The EHB is a web-based portal that grantees use to submit information to HRSA. The Small Health Care Provider Quality Improvement Program (Rural Quality) Performance Measures form is a tool that allows FORHP to measure the impact of the grant funding. These measures last received OMB review and approval under OMB Number 0915-0387 and have a current expiration date of July 31, 20XX.

In its authorizing language (SEC. 711. [42 U.S.C. 912]), Congress charged FORHP with “administering grants, cooperative agreements, and contracts to provide technical assistance and other activities as necessary to support activities related to improving health care in rural areas.” FORHP’s mission is to improve access to quality health care in rural communities.

This activity will collect information for the FY16 cohort of the Rural Quality Program. The Rural Quality Program is authorized by Section 330A(f) of the Public Health Service Act, 42 U.S.C. 254c f), as amended by section 201, P.L. 107-251 of the Health Care Safety Net Amendments of 2002. The purpose of the Rural Quality Program is to provide support to rural primary care providers for implementation of quality improvement activities. The goal of the program is to promote the development of an evidence-based culture and delivery of coordinated care in the primary care setting. Additional objectives include: improved health outcomes for patients; enhanced chronic disease management; and better engagement of patients and their caregivers. The Rural Quality Performance Improvement and Measurement System (PIMS) is the reporting system for the Rural Quality Program grantees. PIMS is a tool that allows FORHP to measure the impact of the grant funding.

1. **Purpose and Use of Information Collection**

FORHP conducts annual data collection of user information for the Rural Quality Program. The purpose of this data collection is to provide HRSA with information on how well each grantee is meeting the needs of implementing quality improvement activities in a primary care setting.

Data is proposed to be collected annually to provide quantitative information about the programs, specifically the characteristics of: a) the population served, b) sustainability, c) health information technology and quality improvement activities, and d) clinical outcomes.

This assessment will provide useful information on the Rural Quality program and will enable HRSA to assess the success of the program. It will also ensure that funded organizations have demonstrated a need for services in their communities and those federal funds are being effectively used to provide services to meet those needs.

The type of information requested in the Rural Quality PIMS enables FORHP to assess the following characteristics about its programs:

* The demographic characteristics of the population served through the program.
* The types of sustainability efforts initiated to maintain improvements once grant funding has ended.
* The types of health information technology and quality improvement activities strengthened or expanded through the program.
* Performance on clinical quality outcome measures.

The HRSA Electronic Handbook (EHB) is capable of identifying and responding to the needs of the grantees that receive Rural Quality Program funding. The EHB:

* Provides uniformly defined data for major FORHP grant programs.
* Facilitates the electronic transmission of data by the grantees, through use of standard formats and definitions.

1. **Use of Improved Information Technology and Burden Reduction**

This activity is fully electronic. Data will be collected through and maintained in a database in the HRSA Electronic Handbook (EHB). The EHB is a website that all HRSA grantees, including those for the Rural Quality program, are required to use when applying electronically for grants using OMB approved Standard Forms. Grantees can email or call EHB staff for help with the website. As this database is fully electronic, burden is reduced for the grantee and program staff. The time burden is minimal, since there is no data entry element for program staff due to the electronic transmission from grantee systems to EHB; additionally, there is less chance of error in translating data and analysis of the data.

1. **Efforts to Identify Duplication and Use of Similar Information**

There is no other data source available that tracks the quality improvement efforts by primary care health care providers in rural areas.

1. **Impact on Small Businesses or Other Small Entities**

Every effort has been made to ensure the data requested is data that is currently being collected by the projects or can be easily incorporated into normal project procedures. Data being requested by projects is useful in determining whether grantee goals and objectives are being met. The data collection activities will not have a significant impact on small entities.

1. **Consequences of Collecting the Information Less Frequently**

It is proposed that respondents will respond to this data collection on an annual basis. This information is needed by the program, FORHP and HRSA in order to measure effective use of grant dollars to report on progress toward strategic goals and objectives. There are no legal obstacles to reduce the burden.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

This request fully complies with the regulation guidelines in 5 CFR 1320.5.

1. **Comments in Response to the Federal Register Notice/Outside Consultation**

**Section 8A:**

A 60-day Federal Register Notice was published in the Federal Register on Month XX, 20XX, vol. XX, No. XX; p. XXXX (see attachment A).

There were (included here either “no” or a description of comments are discussed here) public comments.

**Section 8B:**

In order to create a final set of performance measures that are useful for all program grantees, a set of measures was vetted to nine grantee organizations in 2016 who were selected for their status as current award recipients who would be reporting on the measures during the program. The following grantees were consulted:

Ann Lewis

Chief Executive Officer

Care South Carolina

Phone: (843) 857-0111

Email: [Ann.Lewis@caresouth-carolina.com](mailto:Ann.Lewis@caresouth-carolina.com)

Sherri Cox, B.Sc.N.

Clinical Manager/Director of Nurses

Cross Road Medical Center

Phone: (907) 822-3203

Email: [scox@crossroadmc.org](mailto:scox@crossroadmc.org)

LeeAnn Horn, RN, MSN

Regional Director of Senior Services

Providence Health & Services Washington

Phone: (907) 212-6285

Email: [Leeann.Horn@providence.org](mailto:Leeann.Horn@providence.org)

Heidi Britton

Chief Executive Officer

Northwest Michigan Health Services

Phone: (231) 947-1112

Email: [hbritton@nmhsi.org](mailto:hbritton@nmhsi.org)

Gwen Williams, MSW, LMSW

Director of Programs

Northwest Michigan Health Services

Phone: 231-861-2130

Email: [gwilliams@NMHSI.org](mailto:gwilliams@NMHSI.org)

John Isfort, MPA

Director, Project HOME Network

Marcum & Wallace Memorial Hospital

Mercy Health Partners of Southwest Ohio

Phone: (606) 723-2115

Email: [jisfort@mercy.com](mailto:jisfort@mercy.com)

Germaine Stefanac, RN

Upper Peninsula Health Care Solutions

Phone: 906-225-7166

Email: [gastefanac@uphp.com](mailto:gastefanac@uphp.com)

Dennis Smith

CEO/Executive Director

Upper Peninsula Health Care Solutions

Phone: (906) 225-7938

Email: [dhsmith@uphp.com](mailto:dhsmith@uphp.com)

Carrie Riley, RN, MSN

Project Director

Shawano Medical Center, Inc.

Phone: 920-540-7898

Email: [carrie.riley@thedacare.org](mailto:carrie.riley@thedacare.org)

Dr. Sandra Groenewold, M.D.

Physician Lead, Population Health

Shawano Medical Center, Inc.

Email: [Sandra.Groenewold@thedacare.org](mailto:Sandra.Groenewold@thedacare.org)

No major problems were identified that could not be resolved during consultation.

1. **Explanation of any Payment/Gift to Respondents**

Respondents will not receive payment or gifts and will not be remunerated.

1. **Assurance of Confidentiality Provided to Respondents**

The data system does not involve the reporting of information about identifiable individuals; therefore, the Privacy Act is not applicable to this activity. The proposed performance measures will be used only in aggregate data for program activities.

1. **Justification for Sensitive Questions**

Race and ethnicity is the only sensitive information collected for the Rural Quality measures. HHS requires that race and ethnicity be collected on all HHS data collection instruments. Information for this section is collected in a way in which patient identity remains anonymous.

The collection of this information aids in informing the programmatic population demographics in order to appropriately identify and maintain culturally sensitive and competent approaches to services and activities are conducted through Rural Quality program implementation.

1. **Estimates of Annualized Hour and Cost Burden**

This section summarizes the total burden hours for this information collection in addition to the cost associated with those hours.

**12A.** **Estimated Annualized Burden Hours**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Type of**  **Respondent** | **Form**  **Name** | **No. of**  **Respondents** | **No.**  **Responses**  **per**  **Respondent** | **Average**  **Burden per**  **Response**  **(in hours)** | **Total Burden Hours** |
| **Rural Quality Grantee key personnel** (Project Director) | Small Health Care Provider Quality Improvement Program Performance Improvement and Measurement System Measures | 32 | 1 | 8 | 256 |
| **Total** |  | 32 | 1 | 8 | **256** |

These estimates were determined by consultations with three (9) current grantees from the program. These grantees were sent a draft of the questions that pertain to their program. They were asked to estimate how much time it would take to answer the questions.

It should also be noted that the burden is expected to vary across the grantees. This variation is tied primarily to the type of program activities specific to the grantee’s project and current data collection system.

**12B**.

**Estimated Annualized Burden Costs**

|  |  |  |  |
| --- | --- | --- | --- |
| **Type of**  **Respondent** | **Total Burden**  **Hours** | **Hourly**  **Wage Rate** | **Total Respondent Costs** |
| Project Director | 8 | $42.59 | $340.72 |
| Total | 8 | $42.62 | $340.72 |

1. **Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

There is no capital or start-up cost component for this collection

1. **Annualized Cost to Federal Government**

Annual data collection for this program is expected to be carried out at a cost to the Federal Government of $33,000. Staff at FORHP monitor the grants and provide guidance to grantee project staff at a cost of $3,299.76 per year (72 hours per year at $45.83 per hour at a GS-12 salary level). The total annualized cost to the government for this project is $36,299.76.

1. **Explanation for Program Changes or Adjustments**

This request is for revisions to extend the measures with a change in decreasing burden from bi-annual reporting to annual reporting. This revision will decrease the burden while continuing to provide information collection needed to adequately assess the program.

1. **Plans for Tabulation, Publication, and Project Time Schedule**

There are no plans to publish the data. The data may be used on an aggregate program level to document the impact and success of program. This information might be used in the FORHP Annual Report produced internally for the agency.

1. **Reason(s) Display of OMB Expiration Date is Inappropriate**

The expiration date will be displayed.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.