

Supporting Statement A.

Request for Reinstatement:

**Customer Surveys Generic Clearance
for the
National Center for Health Statistics**

OMB No. 0920-0729

(Expires May 31, 2017)

Contact Information

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- B2. Federal Register Notice Public Comment
- C. Human Subjects Memo

SUPPORTING STATEMENT A

Customer Surveys Generic Clearance for the National Center for Health Statistics

- Goal of the study: to conduct voluntary customer surveys to assess strengths in agency products and services and to evaluate how well it addresses the emerging needs of its data users
- Intended use of the resulting data: to plan future initiatives
- Methods to be used to collect: methodologies may include evaluation forms, mail surveys, focus groups, automated and electronic technology (e.g., e-mail, Web-based surveys), and telephone surveys
- The subpopulation to be studied: Federal customers and policy makers, state and local officials who rely on NCHS data, the broader educational, research, and public health community, and other data users.
- How data will be analyzed: The information collected through this generic Information Collection Request will not be used to make generalizable statements. The resulting information will be for NCHS internal use.

This is a request for a reinstatement of the Customer Surveys Generic Clearance for the National Center for Health Statistics (OMB No. 0920-0729, expires 05/31/2017). A three-year clearance is requested.

In anticipation of increased attendance during the upcoming National Health Statistics Conferences along with an anticipated increase in the number of NCHS website users, proposed focus groups, and other customer surveys an increase in burden hours has been requested. The total burden for the Customer Surveys Generic Clearance will now equal 4,000 hours compared to the 2,440 hours captured in the most recently approved package.

A. Justification

1. Circumstances Making the Collection of Information Necessary

As part of a comprehensive program, the National Center for Health Statistics (NCHS), Centers for Disease Control and Prevention, surveys its customers' satisfaction with the quality and relevance of the information it produces. NCHS conducts voluntary customer surveys to assess strengths in agency products and services. Results of these surveys will be used in future planning initiatives. NCHS requests a three-year approval from the OMB to revise the generic clearance package for future customer surveys it plans to conduct. NCHS is authorized to collect data under Section 306 of the Public Health Service Act (42 USC 242k) (Attachment A).

Background

NCHS, the Nation's principal health statistics agency, compiles statistical information to guide actions and policies to improve the health of the U.S. population. The national surveys and data systems administered by NCHS are a unique public resource for health information—a critical element of public health and health policy. Assessment of key data users' and policy-makers' satisfaction with the quality and relevance of NCHS' products and services is of prime importance in evaluating our agency's performance. Voluntary customer surveys to ascertain strengths in agency products and services are useful tools for management in program planning.

Data will be collected using a combination of methodologies appropriate to each survey. These may include: evaluation forms; mail surveys; focus groups; automated and electronic technology (e.g. e-mail, Web-based surveys); and telephone surveys.

NCHS will submit to OMB individual survey requests under this generic clearance. OMB will provide feedback on the individual requests within ten working days.

NCHS is a unique public resource for health information – a critical element of public health and health policy. These data allow NCHS to document the health status of the population and of important subgroups, identify disparities in health status and use of health care by race/ethnicity, socio-economic status, region, and other population characteristics, monitor trends in health status and health care delivery, identify health problems, support biomedical and health services research, provide information for making changes in public policies and programs, and evaluate the impact of health policies and programs. NCHS collects data from birth and death records, medical records, interview surveys, and through direct physical exams and laboratory testing.

Information is at the core of the NCHS mission. It is critical that information be available to provide customers with quick and easy access to a wide range of information and data through a variety of channels. Customer satisfaction and customer input are critical for accomplishment of our mission as a key element of the national public health infrastructure, providing important surveillance information that helps identify and address critical health problems. Satisfaction can be enhanced through suggestions for ways to improve our outputs and services, whether presentation of data on the Web, publications, statistical services, or other products at NCHS.

Surveys of several groups are anticipated. Among these are Federal clients and policy makers; state and local officials who rely on NCHS data; the broader educational, research, and public health community; and other data users. Other users may include self-selected broad-based groups of data users who register for and attend NCHS sponsored conferences as well as persons who access the NCHS Web site.

2. Purpose and Use of the Information

Executive Order 12862 directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. Under this Order, agencies are instructed to "provide significant services directly to the public" and to "survey customers to determine the kind and quality of services they want and their level of satisfaction with existing services." NCHS provides a number of services and products to the public and to its partners, including State or local governments, health care providers and facilities, academic researchers, and other entities and organizations. The purpose of this submission is to obtain generic approval for satisfaction surveys of our partners and data users to identify ways in which we can improve our products and services to better address their needs.

NCHS places the highest priority on providing quality products and services to our customers. We will use the results of all of our customer surveys to identify strengths and weaknesses in those current products and services and to refine and improve them by implementing modifications that are practical and feasible. Information obtained in these surveys will guide NCHS management in program planning.

In the past, surveys have been conducted under this generic approval with 1) "reimbursable collaborators"-- agencies, mostly governmental, which funded components of NCHS surveys; 2) Conference attendees--through both focus groups during the conferences and an email surveys of attendees following the meetings; 3) Federal "power users" of NCHS data--agencies that use NCHS data for analysis, policy, and other purposes. This included policy staff in the Department of Health and Human Services (DHHS) as well as representatives of Congressional support agencies including the Congressional Budget Office and the General Accountability Office; and 4) users of the NCHS web site--both through "usability testing" at the NCHS Conferences and through internet-based surveys of users of the NCHS website. (Future efforts are expected to also include non-federal agencies and organizations.) These surveys yielded valuable information about current satisfaction with NCHS products and services, as well as suggestions for future improvements.

3. Use of Information Technology and Burden Reduction

The surveys will employ the newest information technology to collect and analyze data. They will be conducted electronically when feasible. In those cases, respondents will submit their responses electronically; and these responses will be tallied electronically and put into a database by survey software. Electronic collection will minimize the burden on survey respondents and facilitate the most rapid processing of survey results. This, in turn, provides NCHS the quickest means for making improvements based on customer feedback. In some instances, however, the most appropriate methodology will involve written or oral responses to brief questionnaires, interviews, and focus groups.

4. Efforts to Identify Duplication and Use of Similar Information

There are no current broad-based data available on customer satisfaction with NCHS products and services.

5. Impact on Small Businesses or Other Small Entities

In as much as a few small businesses may be included in the audience for some surveys, they should not be not adversely affected by the customer surveys. The number of questions will be held to the absolute minimum for the intended use of the data. Form design and the electronic data collection methodology will further minimize respondent burden.

6. Consequences of Collecting the Information Less Frequently

These surveys are appropriate vehicles to examine public perception of NCHS' ability to respond in a timely manner to the needs of its customers. Collection of information routinely and systematically enhances its utility in monitoring customer satisfaction and in identifying problems and needs so as to make changes and improve products and services. The planned surveys are expected to be one-time surveys or surveys updated at selected intervals. There are no legal obstacles to reduce the burden.

7. Specific 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 Agency

a. Federal Register Notice

The 60-day notice was published in the *Federal Register*, Vol. 82, No. 44, March 8, 2017, pages 12963-12965 (Attachment B). Only one public comment was received. A standard response was provided.

b. Consultation

Consultations related to specific projects will be provided in those respective request submissions.

9. Explanation of Any Payment or Gift to Respondents

This collection of information does not involve any payment or gift to respondents.

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

The data are covered under Privacy Act System of Records 09-20-0169, Users of Health Statistics.

An assurance of confidentiality is provided to all respondents according to section 308 (d) of the Public Health Service Act (42 USC 242m) which states:

"We take your privacy very seriously. All information that relates to or describes identifiable characteristics of individuals, a practice, or an establishment will be used only for statistical purposes. NCHS staff, contractors, and agents will not disclose or release responses in identifiable form without the consent of the individual or establishment in accordance with section 308(d) of the Public Health Service Act (42USC 242m) and the Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA, Title 5 of Public Law 107-347). In accordance with CIPSEA, every NCHS employee, contractor, and agent has taken an oath and is subject to a jail term of up to five years, a fine of up to \$250,000, or both if he or she willfully discloses ANY identifiable information about you. In addition, NCHS complies with the Federal Cybersecurity Enhancement Act of 2015. This law requires the federal government to protect federal computer networks by using computer security programs to identify cybersecurity risks like hacking, internet attacks, and other security weaknesses. If information sent through government networks triggers a cyber threat indicator, the information may be intercepted and reviewed for cyber threats by computer network experts working for, or on behalf, of the government. "

In addition, legislation covering confidentiality is provided according to section 513 of the Confidential Information Protection and Statistical Efficiency Act (PL 107-347) which states:

"Whoever, being an officer, employee, or agent of an agency acquiring information for exclusively statistical purposes, having taken and subscribed the oath of office, or having sworn to observe the limitations imposed by section 512, comes into possession of such information by reason of his or her being an officer, employee, or agent and, knowing that the disclosure of the specific information is prohibited under the provisions of this title, willfully discloses the information in any manner to a person or agency not entitled to receive it, shall be guilty of a class E felony and imprisoned for not more than 5 years, or fined not more than \$250,000, or both."

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

The NCHS Human Subjects Contact has determined that customer satisfaction surveys do not require their review and approval (Attachment C). No sensitive questions are anticipated; however, any collection of a sensitive nature will be described in that collection submission.

12. Estimates of Annualized Burden Hours and Costs

Table 1 presents the estimate of number of respondents and burden hours for surveys over the three-year period. In anticipation of increased attendance during the upcoming National Health Statistics Conferences, the number of respondents /attendees completing questionnaires has been increased from 4,500 to 6,000 and the average burden per response from 10 to 15 minutes for a total of 1,500 burden hours (up from 750 hours). While the average focus group response time of one hour will remain the same, it is estimated that the number of participants may increase from 240 to as much as 500 for a total burden time of 500 hours. Likewise, the number of NCHS website users has remained at 6,000; however, the average response time has increased from 10 to 15 minutes changing the burden from 1000 hours to 1,500 hours. And finally, the number of other potential customer surveys has increased from 1,800 to 2,000, with the same average burden of 15 minutes per response. The overall total burden for the Customer Surveys Generic Clearance will now equal 4,000 hours compared to the 2,440 hours captured in the most recently approved package. Specific information will be provided with the project submission.

Table 1. Estimates of Annualized Burden Hours for NCHS Customer Surveys

Type of survey	Number of Respondents	Number of responses/ respondent	Average Burden/ response (in hours)	Response Burden (in hours)
Questionnaire for conference registrants/attendees	6,000	1	15/60	1,500
Focus groups	500	1	1	500
Web-based	6,000	1	15/60	1500
Other customer surveys	2,000	1	15/60	500
Total	14,500	4,000

There is no cost to respondents other than their time to participate.

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

There are no additional costs to the respondents.

14. Annualized Cost to the Federal Government

While actual annualized costs will vary dependent on the scope of future survey submissions, it is anticipated that the costs related to staff salaries for planning and implementing the future surveys might average \$100,000.

15. Explanation for Program Changes or Adjustments

In anticipation of increased attendance during the upcoming National Health Statistics Conferences along with an anticipated increase in the number of focus group participants, NCHS website users, and other customer surveys, the total burden for the Customer Surveys Generic Clearance will now equal 4,000 hours compared to the 2,440 hours captured in the most recently approved package.

16. Plans for Tabulation and Publication and Project Time Schedule

Data collected will be analyzed to inform NCHS planning activities. This information is for internal use only. Summary data may be provided to OMB and DHHS; however no publications are planned.

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

Display of OMB expiration date is appropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.