

SUPPORTING STATEMENT

Part A

National Guideline Clearinghouse™ (NGC)
National Quality Measures Clearinghouse™ (NQMC)
0935-0106

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Agency for Healthcare Research and Quality (AHRQ)

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A. Justification

1. Circumstances that make the collection of information necessary

The mission of the Agency for Healthcare Research and Quality (AHRQ) is to produce evidence to make health care safer, higher quality, more accessible, equitable, and affordable, and to work with the U.S. Department of Health and Human Services (HHS) and other partners to make sure that the evidence is understood and used. Through its authorizing legislation (The Healthcare Research and Quality Act of 1999), AHRQ is charged with, among many tasks, disseminating evidence.

The National Guideline Clearinghouse™ (NGC) and the National Quality Measures Clearinghouse™ (NQMC) are sponsored by AHRQ, U.S. Department of Health and Human Services, and have been so since their inception in 1997 and 2001 respectively. NGC is an Internet-accessible relational database and Web site containing structured summaries of evidence-based clinical practice guidelines. NQMC is an Internet-accessible relational database and Web site containing structured abstracts of evidence-based quality measures. Both databases and Web sites disseminate these evidence-based information products (i.e., guidelines and measures) and encourage their use. NGC and NQMC were designed for and are visited by clinicians, guideline or quality measure developers, health plans, hospitals and health systems, state and federal agencies, policymakers, researchers, and others to help inform decisions about patient care. NGC can be accessed via the Internet at <http://www.guideline.gov> and NQMC at www.qualitymeasures.ahrq.gov.

“Expert Commentaries” is an established editorial feature common to both NGC and NQMC. Expert Commentaries are authored by the NGC/NQMC Editorial Board and/or by other experts working in conjunction with the Editorial Board. The commentaries offer insights not obvious from the information provided by guideline and measure submitters and educate users on the nuances of guideline or measure development, adaptation, implementation and evaluation. See Attachment B for an example of an Expert Commentary that was published to the NQMC Web site.

The Response to Expert Commentary is also an established feature on the NGC and NQMC Web sites; it allows readers to an opportunity to submit a comment, judgment, question, counterpoint, etc in response to a commentary. This mechanism serves AHRQ’s mission directly, as fostering dialogue on these issues helps disseminate available scientific evidence among diverse stakeholders and also can help develop, refine, and support efforts to improve health care quality. Additionally, it provides a mechanism to foster understanding and use of evidence.

2. Purpose and Use of Information

ECRI Institute is the prime contractor for NGC/NQMC (AHRQ Contract No.HHSA290201300006C). The purpose of this statement is to describe ECRI Institute’s

plan to continue supporting/offering a mechanism for NGC/NQMC users to provide responses to Expert Commentaries published to the NGC/NQMC Web sites.

Specifically, users who wish to respond to a commentary will be directed to the Web-based form, which is used to submit a response (See Attachment C, Commentary Response Submission Form, developed for Expert Commentaries). Responses accepted for publication would be posted to the NGC and/or NQMC Web site(s) along with the submitter's name, current position or occupation, organizational affiliation and disclosed potential conflicts of interest. No other information collected through the Response Submission Form (i.e., email or other address) would be published or made accessible to users of the NGC/NQMC Web sites. A submitter's address is not required and would potentially be used for follow-up correspondences in cases where clarifying information is needed. The search features of the NGC/NQMC Web sites are limited to the contents of the guideline/measure summaries and other guideline and measure-related content, and cannot be used to find a response submitter's personal identifying information.

Submitted responses being considered for publication will be reviewed by the NGC/NQMC Project Managers, the NGC/NQMC Project Director, the co-chairs of the NGC/NQMC Editorial Board, and the AHRQ NGC/NQMC Contracting Officer Representative. Criteria for publication of responses to commentaries include:

- relevance of response to the subject of the commentary
- responses that provide a unique perspective to the commentary
- responses that offer an alternative view than the commentary
- responses that are clearly articulated
- responses that are neither excessively long or offensive and/or nonobjective

3. Use of Improved Information Technology

As Web-only resources, NGC and NQMC communicate with their users via the respective accessible Web sites. Accordingly, a Web-based form was developed to facilitate collection of responses to our Expert Commentaries. The use of an online submission form is the most timely and efficient manner in which to receive responses. Since NGC and NQMC are Web-based resources, no additional mechanisms, such as post or fax, were considered.

4. Efforts to Identify Duplication

No other organizations in the U.S. public/private sector maintain a guideline or quality measures clearinghouse that is as comprehensive as NGC/NQMC and represents guidelines and measures from both U.S. and non-U.S guideline and measure developing organizations. The Expert Commentary feature within NGC/NQMC is unique as is the Response to Commentary feature. No other agency or units within AHRQ collect similar information.

5. Involvement of Small Entities

The Response Submission Form is intended for persons or organizations that are already spending time at the NGC/NQMC Web site(s) and have chosen to use the Web site(s).

While we anticipate that participation within small entities will be included in the pool of respondents, we anticipate little or no impact on small business or other entities. The form is short and is completed on a voluntary basis. We do not expect that our data collection procedures will result in any significant additional burden for small entities. Rather the data collection efforts are designed to minimize burden on all respondents.

6. Consequences if Information Collected Less Frequently

Responses to Expert Commentaries will continue to be submitted on a voluntary *ad hoc* basis. While individuals are welcome to submit multiple responses, each response is considered a one-time event.

7. Special Circumstances

No special circumstances apply.

8. Federal Register Notice and Outside Consultations

8.a. Federal Register Notice

This request is made under AHRQ's existing generic information collection authorization, OMB No. 0935-0106, entitled, "Voluntary Customer Satisfaction Survey Generic Clearance for the Agency for Healthcare Research and Quality." Publication in the Federal Register is not required.

8.b. Outside Consultations

The practice of allowing viewers of the NGC and NQMC Web sites to respond to Expert Commentaries through an online submission form was approved under the prior contract and carried over into the current contract with the approval of the NGC/NQMC Editorial Board and AHRQ. The consensus opinion was, and continues to be, that online response to commentaries is a desirable feature that will stimulate and facilitate dialogue among the NGC/NQMC audience and authors of the Expert Commentaries.

9. Payments/Gifts to Respondents

Response submitters will not be financially compensated for participating and participation is voluntary.

10. Assurance of Confidentiality

Individuals and organizations will be assured of the confidentiality of their replies under Section 934(c) of the Public Health Service Act, 42 USC 299c-3(c). They will be told the purposes for which the information is collected and that, in accordance with this statute, any identifiable information about them will not be used or disclosed for any other purpose.

Individuals and organizations contacted will be further assured of the confidentiality of their replies under 42 U.S.C. 1306, and 20 CFR 401 and 4225 U.S.C.552a (Privacy Act

of 1974). In instances where respondent identity is needed, the information collection will fully comply with all respects of the Privacy Act.

Information that can directly identify the respondent (e.g., name) will be collected. Specifically, the following personal identifying information will be collected (see also Attachment C, Response Form):

- First Name*
- Last Name*
- E-mail Address*
- Address
- City
- Country
- State/Province
- Zip Code/Postal Code
- Current Position or Occupation
- Organizational Affiliation

Note: Only items marked with an asterisk are required. No information about race/ethnicity will be collected. The Response to Expert Commentaries feature is voluntary and will follow a model similar to what is used in many medical journals to allow readers to write “Letters to the Editor” or “Rapid Responses” to articles published on the Internet. Such models typically include the author’s name, occupation, and organizational affiliation, as well as potential conflicts of interest. This lends credibility to the responses and allows for dialogue among professionals.

Responses accepted for publication would be posted to the NGC and/or NQMC Web site(s) along with the submitter’s name, current position or occupation, organizational affiliation (where provided), and disclosed potential conflicts of interest. No other information collected through the Response Submission Form (i.e., email or other address) would be published or made accessible to users of the NGC/NQMC Web sites.

The search features of the NGC/NQMC Web sites are limited to the contents of the guideline/measure summaries and other guideline and measure-related content, and cannot be used to find a response submitter’s personal identifying information.

11. Questions of a Sensitive Nature

No sensitive data will be collected.

12. Estimates of Annualized Burden Hours and Costs

Exhibit 1 shows the estimated annual burden hours for the respondent's time to participate in this project. The expert commentary comment form can be filled out in approximately 90 seconds per respondent. The total annual burden is estimated at .25 hours.

Exhibit 2 shows the cost burden associated with the respondents' time to participate in the project. The annual cost burden is estimated at \$89.83.

Exhibit 1. Estimated annualized burden hours

| Form Name | Number of Respondents | Number of responses per respondent | Hours per response | Total Burden hours |
|---|-----------------------|------------------------------------|--------------------|--------------------|
| NGC/NQMC Response Submission Form (Expert Commentaries) | 10 | 1 | 1 | .25 |
| Total | 10 | 1 | 1 | .25 |

Exhibit 2. Estimated annualized cost burden

| Form Name | Number of Respondents | Total Burden hours | Average Hourly Wage Rate* | Total Cost Burden |
|---|-----------------------|--------------------|---------------------------|-------------------|
| NGC/NQMC Response Submission Form (Expert Commentaries) | 10 | .25 | \$35.93 | \$89.83 |
| Total | 10 | .25 | \$35.93 | \$89.83 |

*Based upon the mean of the average wages, Healthcare Practitioners and Technical Occupations, National Compensation Survey: Occupational wages in the United States May 2013, “U.S. Department of Labor, Bureau of Labor Statistics.”

13. Estimates of Annualized Respondent Capital and Maintenance Costs

There are no direct costs to respondents other than their time to participate.

Submitters would only be required to be able to access the Web. No additional expenses would be incurred by participants.

14. Estimates of Annualized Cost to the Government

Responses to Commentaries are sent to AHRQ and reviewed and approved by the designated Health Scientist Administrator that monitors the program before the Responses are published to the NGC and/or NQMC Web site. The average hourly salary for the position of Health Scientist Administrator at the GS-14-Step 9 grade level is \$64.49 per hour. The Federal hourly salary information is available on the OPM web site at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2014/DCB_h.pdf.

| | Total Responses | Estimated Review Time | Estimated Hourly Federal Salary | Total Cost Burden |
|---------------------------|-----------------|-----------------------|---------------------------------|-------------------|
| Responses to Commentaries | 10 | 5 min | \$64.49 | \$53.74 |
| Total Burden | 10 | 5 min | \$64.49 | \$53.74 |

15. Changes in Hour Burden

The Response to Expert Commentaries hour burden is very small, approximately 90 seconds, and this is consistent with actual experience with the feature.

16. Time Schedule, Publication and Analysis Plans

No analysis of collected information is planned.

17. Exemption for Display of Expiration Date

AHRQ does not seek this exemption.

B. Attachments

Attachment A: AHRQ's Authorizing Legislation

Attachment B: Sample Expert Commentary

Attachment C: Expert Commentary Response Form