Responses to comments on OMB package: Assessment of Occupational Injury among Fire Fighters Using a Follow-back Survey (New Information Collection Request)

**Section A**

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| **Comment** | **Response** |
| Page 4: Edit made to align with how this is described in the supporting statement for #3041-0029 (Higgins) | The project team agrees with this change. Text edits in this sentence and the following sentence were accepted. |
| Page 7: I’m not sure that this SORN is appropriate for this collection, since that SORN is described as follows. Also, the PIA that was included references the fact that CPSC will be the one to collect and store PII. Why is HHS’s SORN being cited here, rather than CPSC’s? Please consult with HHS’s Privacy office if the program cannot answer these questions. (Higgins) | Per conversations between Tami Sawyer and ICRO, the mention of the SORN has been removed. Text has been added to indicate that CPSC is responsible for collecting personally identifiable information (PII) and that this PII is not provided to NIOSH. |

**Section B**

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| **Comment** | **Response** |
| Page 4: This seems dated. Are the weights updated with more recently available information? Are there plans to resample at some point? (OMB\_RS) | While the sample itself is based on the 1995 census of hospitals the weights are adjusted annually to account for changes to the sampling frame. Please see page 2 of this document: <https://www.cpsc.gov/s3fs-public/pdfs/blk_media_2001d011-6b6.pdf>.  The sentence was modified as follows: While selection of the current hospital sample was based on a 1995 census of U.S. hospitals, weights are adjusted annually to account for changes to the sampling frame. |
| Page 4: Is there any estimate of how much of the population will be excluded as a result? (OMB\_RS) | There is no estimate but this is likely to be negligible as fire fighters are public servants and as such, required to interact with the public and effectively communicate with other members of the department while on scene. In two previous surveys that were conducted in Spanish in addition to English, the percentage of Spanish speaking respondents in the entire workforce was quite small.  We will ask the CPSC-contracted interviewers to informally track how many respondents are unable to complete the interview due to being non-English speaking.  No changes were made. |
| Page 5: Comment 1: Why offer an opt-out at the notification stage? Isn’t there opportunity to opt-out on the phone?  Comment 2: What does NIOSH do if the hospital can only provide phone, or only provide mailing address? (OMB\_RS) | Response 1: This is standard protocol for the follow-back surveys that CPSC conducts. If the potential respondent knows that they are not interested and they do not want to be bothered, they can call CPSC immediately.  The introduction of the survey also gives the respondent an opportunity to opt out of the interview as well.  Response 2: Cases where only partial information is available would be counted as a noncontact case in the overall response rate.  No changes were made. |
| Page 5: See OMB suggestions on the letter, which could be harming response rates. (OMB\_RS) | It wasn’t clear which comment the reviewer was referring to so I’m including the response to both comments.  Regarding the use of CPSC vs CDC/NIOSH letterhead: The fire fighter special study is being conducted by CPSC, not by NIOSH. NIOSH initiated and sponsored the study but CPSC is the primary point of contact. NEISS hospitals are contracted by CPSC, telephone interviewers are contracted by CPSC, fire fighters call CPSC to opt out, and the questionnaire data are processed by CPSC before being passed to NIOSH for analysis purposes. NIOSH is involved but primarily on the front and back end of the project. CPSC, NEISS, and CPSC-contracted interviewers are involved in collecting contact information, data collection, and data processing.  For these reasons, the letter introducing the study will remain on CPSC letterhead.  Regarding the language indicating the risk of loss of information: This language has been used in letters for similar follow-back surveys. The NIOSH IRB requires the inclusion of information on the risks (loss of confidentiality) and what the respondent should do if injured or harmed.  No changes were made. |
| Page 6: Could NIOSH attempt to locate these respondents through local FDs? (OMB\_RS) | Through the CPSC NEISS program, we are only able to identify respondents through the contracted hospitals. They do collect or have the ability to obtain information on the fire department they serve with.  However, as noted in #2 on this same page, the project team has noted that NIOSH will be working with fire service partners to advertise information about this survey in an effort to encourage fire fighters to respond if contacted. We are hopeful that this will assist in increasing the response rate.  No changes were made. |

**Attachment C – Follow-back Survey**

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| **Comment** | **Response** |
| Page 3: If the intro letter continues to come from CPSC, do you want to include their involvement here? (Higgins) | Based on comments to Section B as well as the pre-interview letter, the project team agrees that the letter should come from CPSC. However, the letter does reference NIOSH so we agree that the introduction needs to mention both NIOSH and CPSC. Therefore, a minor modification has been made to this paragraph to reference the letter that “came from the Consumer Product Safety Commission.” |
| Page 6: What does this mean? That the contribution of that reason to the injury or exposure was greater than the other reasons? Or the reason that led to the more severe portion of their injuries? Suggesting adding some text here to explain what you mean by serious or offer a more precise differentiation. (Higgins) | We are referring to the most severe injury. The text was modified to reflect this. |
| Page 7: Why is this question and #11 being asked here, rather than after the more detailed info about the incident? We suggest it be moved to right before the employment section. (Higgins) | The injury/exposure outcome section that this comment refers to is related to post-ED. While the project team recognizes that bill payment doesn’t occur until after the ED visit, all of the questions in this current section are related to the ED visit itself. The project team feels comfortable with leaving this question where it is.  No changes were made. |

**Attachment D – Pre-interview Letter**

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| **Comment** | **Response** |
| Page 2: Other agencies have shown increases in response rate from using CDC letterhead. It’s also confusing that the 1st paragraph states that the study is being conducted by NIOSH/CDC, but the letter is from CPSC.  Suggest having the letter come from CDC. Is there a reason that cannot be done? (OMB\_RS) | As noted above, the fire fighter special study is being conducted by CPSC, not by NIOSH. NIOSH initiated and sponsored the study but CPSC is the primary point of contact. NEISS hospitals are contracted by CPSC, telephone interviewers are contracted by CPSC, fire fighters call CPSC to opt out, and the questionnaire data are processed by CPSC before being passed to NIOSH for analysis purposes. NIOSH is involved but primarily on the front and back end of the project. CPSC, NEISS, and CPSC-contracted interviewers are involved in collecting contact information, data collection, and data processing.  For these reasons, the letter introducing the study will remain on CPSC letterhead. |
| Page 2: Comment 1: Why “may”? Why doesn’t the advance letter inform the respondent of the phone number that will be used and provide an opportunity to update the number?  Comment 2: Has NIOSH considered providing a link to an online version of the form or a paper mailback? (OMB\_RS) | Response 1: If the phone number is incorrect or they are not home when contacted, there may be no actual contact.  Response 2: Since CPSC conducts data collection, it is up to the discretion of CPSC how the survey is implemented. While CPSC has done research on conducting online surveys, interviews are still being done via phone.  No changes were made. |
| Page 2: Please change if necessary, given comments on the SS Part A. Again, the PIA that was submitted with this package indicates that CPSC will collect and store the PII, not NIOSH, thus, this sentence seems incorrect. (Higgins) | Reference to the SORN was removed. |
| Page 2: Is this statement required by your IRB? This is atypical for a survey collection and could harm response rates. (OMB\_RS) | Yes, these elements are required by the NIOSH IRB.  No change was made. |
| Page 2: This is confusing. The respondent isn’t in the study unless they give the phone interview, correct? Why not say “If you do not want us to contact you for a phone interview…”  This seems unnecessary in general though, since a respondent may refuse to participate when contacted by phone. (OMB\_RS) | Text was modified to clear up possible confusion. |
| Page 2: What about the address? (OMB\_RS) | The intent is to destroy all contact information. Reference to address has been added to this sentence. |