

Assessment of Environmental Health and Land Reuse Certification Training

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Supporting Statement Part A

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Attachments

- Attachment 1. Authorizing Legislation
- Attachment 2. 60-day Federal Register Notice
- Attachment 3a. Follow-up Survey Invitation
- Attachment 3b. Follow-up Survey Reminder
- Attachment 4a. Follow-up Survey - [WORD](#)
- Attachment 4b. Follow-up Survey - Screenshots
- Attachment 5. CDC IRB Approval Letter
- Attachment 6. Privacy Impact Assessment Approval

Justification:

Goal of the study: The goal of the information collection is to collect participant feedback on the environmental health land reuse certificate course content developed by ATSDR and its collaborator.

environmental health and land reuse certificate training.

The Agency for Toxic Substances and Disease Registry (ATSDR) is under a Congressional Mandate to implement the health-related sections of laws that protect the public from hazardous wastes and environmental spills of hazardous substances (Attachment 1). These are specifically the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), the 1984 amendments to the Resource Conservation and Recovery Act of 1976 (RCRA), and the Superfund Amendments and Reauthorization Act of 1986 (SARA), which broadened ATSDR's responsibilities in the areas of public health assessments, establishment and maintenance of toxicologic databases, information dissemination, and medical education.

ATSDR protects the public from harmful exposures related to chemical contamination. ATSDR routinely works with environmental professionals who are primarily state and local health department (LHD) staff. ATSDR also funds health agencies to conduct public health assessment in order to assess potentially harmful exposures and protect the health of the public. Due to the prevalence of potentially contaminated land reuse sites such as brownfields, ATSDR is partnering with the National Environmental Health Association (NEHA) to build capacity among environmental professionals, particularly health agency staff through the certificate course

To increase the capacity for LHDs and other environmental professionals to effectively engage in health-focused land reuse, ATSDR NEHA are co-producing the certificate course. NEHA is under a contract, number 200-2013-57475 to provide aspects of the course to ready it for

online learning, such as module layout, pre- and post-knowledge checks, a marketing plan, and an evaluation plan. ATSDR will host the course internally and plans to post the link with the Centers for Disease Control and Prevention (CDC) Training and Continuing Education Online (TCEO) (0920-0017; expiration 6/30/2019). The link will be available to the public, including NEHA, who may offer their own additional certificate of completion in environmental health and land reuse. In order to assess the certificate program and skills increase of participants, ATSDR intends to reach out to participants to voluntarily complete in an online survey. The 60-day Federal Register Notice (Attachment 2) was published on 06/27/2018 and is further discussed in Section A.8.

The certificate program is not only geared to increase the capacity of environmental professionals, primarily local and state health agencies, but will also benefit planners, environmental consultants, and students in environmental science, environmental/public health, and planning who participate in environmental health activities and land reuse. The environmental health course component focuses on Risk Assessment, Risk Communication, Epidemiology, and Toxicology topics. The land reuse component focuses on a 5-step land reuse strategy that engages populations who may live among or adjacent to environmentally distressed sites and may need to learn skills to successfully learn about resources available for safe land reuse to improve community health.

A.2. Purpose and Use of the Information Collection

The purpose of the information collection is to access the registration data and assess the impact of the certification program meeting the following objectives:

1. Increase participant awareness and knowledge of environmental health and land reuse;
2. Increase skills and capacity of participants to engage in environmental health and land reuse work; and
3. Assess participant feedback and assessment of their own increased awareness, skills, and knowledge in environmental health and land reuse.

The certificate consists of online learning content in ATSDR's website, linked through TCEO. The content includes topics in Environmental Health and Land Reuse, including Community Engagement, Environmental and Health Assessment, Risk Assessment, Risk Communication, Epidemiology, Toxicology, and Land Reuse and Redevelopment.

The certificate program will be hosted on ATSDR's website and linked by TCEO. Continuing education credits will be issued by TCEO for participants who complete the course and

pass each TCEO-required post-test with a score of 80%. Participants who successfully complete (80% score) all five modules of the certificate training are eligible to independently upload their certificates of completion from TCEO for an additional certificate of completion issued by NEHA. NEHA is offering this “EHLR” Certificate of Completion as they are recognized as the “credentialing” entity for many environmental professionals. For example, they offer a Registered Sanitarian certification and food safety/food handling courses that issue a certificate. The target participants are primarily NEHA members who are LHD staff and ATSDR stakeholders who are state health department staff, as well as other environmental professionals, students in environmental health or public health, or planners.

Because the certificate course is new, it is necessary to request from TCEO participant registration email contact information (name and email), as well as job title and location (city name or ZIP code), to facilitate a voluntary follow up (Attachment 4a and 4b). ATSDR will conduct the follow up only one time per participant within a 12-month period of participant completion of the course.

ATSDR intends to use the follow-up data to assess the utility and effectiveness of the educational content and increase in knowledge provided in the certificate. ATSDR will use Research Electronic Data Capture (REDCap) for the feedback questions. ATSDR and NEHA may publish the results of the certificate follow up or use the information to inform the development of additional individual or collaborative environmental health and land reuse resources. In summary, the registration and feedback information will help ATSDR determine impacts of the certification course in building capacity and skills in environmental health and land reuse. Without this information, ATSDR will not be able to assess the effectiveness of the certificate in terms of building participants’ capacity in environmental health and land reuse activities. In addition, ATSDR can generalize feedback from course participants to enhance existing course materials or create new materials that can support additional capacity-building for health agencies to increase their involvement in environmental health and land reuse activities.

A.3. Use of Improved Information Technology and Burden Reduction

Online registration can reduce burden of filling out paper hard copies and reduces security risk and breeches of privacy for storing such documents.

The registration information is standard to TCEO’s online platform (collects minimal information from participants, such as name, password, company name, location or ZIP code, and job title category (e.g. public health/environmental professional, or nurse). The TCEO site has PRA clearance: OMB No: 0920-0017, Exp. Date: 6/30/2019.

ATSDR intends to conduct a one-time voluntary online survey of each participant within 12 months time post-certification. To reduce burden, the online feedback questions

(Attachment 4a and 4b) are designed to take no more than 20 minutes to complete. The majority of the questions are selection (e.g. select one or all that apply) with fill-in options, e.g., “other”. ATSDR will use Research Electronic Data Capture (REDCap) for the feedback questions.

All (100%) of the participants will register and complete the certification completely online. Word and computer screenshot copies of the feedback process are attached as Attachment 4a and 4b (survey screen shots). As part of equity and inclusion practices, ATSDR and NEHA independently may offer an in-person training for populations with limited internet access, who will be eligible for NEHA’s independent Certificate of Completion.

A.4. Efforts to Identify Duplication and Use of Similar Information

Searches in the scientific literature identified only a few specific examples of health agency roles in land reuse or environmental health activities. Most studies more broadly addressed capacity of local health agency professionals to perform or build capacity in areas such as evidence-based decision-making (Jacobs, Duggan, Erwin, Borawski, & Compton, 2014), assessing competencies to engage in community based public health (Parker, Margolis, & Henríguez-Roldan, 2003), or population health improvement (Rodríguez, McCullough, & Hsuan, 2014). From May to June 2016, NEHA evaluated their membership to identify a baseline capacity of LHD and environmental health professionals to address environmental health and land reuse issues. There were 109 respondents, of which 93 (85%) indicated they were LHD professionals. At any time 5-75% of LHD employees reported performing tasks in any of these five environmental health areas: Risk Communication, Risk Assessment, Epidemiology, Toxicology, and Land Reuse and Redevelopment. The majority of respondents reported “no” to only some formal education in these topics (National Environmental Health Association, 2016). While their roles are not well documented in the scientific literature, state and local public health agencies are involved in these arenas through programs such as ATSDR funding or technical assistance and Environmental Protection Agency (EPA)’s promotion of engagement with health agencies in their brownfields funding process. Through ATSDR grant funding, several LHDs across the U.S. were involved in brownfields redevelopment and community health projects (ATSDR, 2016a). Their projects ranged from programs to reduce exposures, communication of risks of exposures, transforming vacant land into agriculture projects, and health promotion and education about land reuse. Other LHDs provided free technical assistance to communities with land reuse issues.

The ATSDR’s Environmental Health and Land Reuse Certificate Program is a new effort that is specifically designed to increase capacity of environmental professionals (e.g. LHD professionals) to engage in health-focused land reuse activities. The ATSDR Land Reuse

and Redevelopment Program has not hosted a training like this in the past. ATSDR is coordinating efforts with other colleagues who may also work with NEHA on similar efforts, such as voluntarily sharing summary (de-identified) participant job title. ATSDR will share the 60-day notice (Attachment 2) and supplemental information to assist colleagues should they have similar information collection needs.

A.5. Impact on Small Businesses or Other Small Entities

Participants in the certification course will be individuals. There will be no impact or burden on small businesses.

A.6. Consequences of Collecting the Information Less Frequently

Post-certification, participants will be asked to voluntarily provide feedback by survey one time, within 12 months after completing the course. There are no technical or legal obstacles to reducing burden.

If the feedback collection is not conducted, ATSDR will not be able to assess the impacts of the certification to increase the capacity of participants to perform environmental health and land reuse activities.

A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances of the ICR. This request fully complies with the regulation 5 CFR 1320.5.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A 60-day Federal Register Notice was published in the *Federal Register* on June 27, 2018, vol. 71, No. 7, pp. 3383-84 (Attachment 2).

ATSDR did not consult with persons outside of the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. This is a new ICR that will collect information that typically has not been collected in the ATSDR Land Reuse and Redevelopment Program activities.

A.9. Explanation of Any Payment or Gift to Respondents

ATSDR is not providing any incentive to certification course participants to respond to the one-time (e.g., at six-months to 12 months) follow up survey. Participants who complete the certification will earn credit (e.g., continuing education hours). Participant response to the feedback survey is optional.

A.10. Protection of the Privacy and Confidentiality of Information Provided by Respondents

PII is collected for this ICR, but ATSDR will not directly collect or retrieve data by PII. Therefore, the Privacy Act is not applicable. The CDC/ATSDR Privacy Officer has reviewed and approved submission (Attachment 6).

This ICR will use two systems for its data needs: TCEO will be used to collect participant registration data and REDCap to obtain feedback data.

TCEO, an authorized and cleared CDC information system (OMB Control No. 0920-0017, expiration 6/30/2019) will collect participant registration data. This system will be used to collect information in identifying form (IIF) such as name, address, email, phone number and zip code to complete participant registration. ATSDR will ask TCEO to provide participant names and emails from their registration process to conduct a one-time, voluntary, follow up survey (see Attachments 4a and 4b). The individual participants in the certificate course will be supplementing their work activities, so the actual participation is business versus voluntary or personal.

To ensure informed consent, individuals who agree to complete the voluntary survey will be provided an email invitation to the survey that contains this statement, "Your participation in this survey is voluntary. Your survey responses will be used only to help us assess the certificate program and its value in your work. Your survey responses may also help us improve the course for future participants. We may aggregate follow up data across participants, but we will not share or release your personally identifiable information, such as your name, address, or email".

A waiver of documentation of informed consent under 45 CFR 46.117 has been approved by the CDC IRB. The research presents no more than minimal risk of harm to subjects and involves no procedures for which written consent is normally required outside the research context.

ATSDR will host the certificate training materials in the Web Content Management System (WCMS). The WCMS is an authorized CDC information system. It has an authority to operate through 1/17/2020.

To protect the personally identifiable information of the participants, ATSDR's Land Reuse Team will store information in a secure computer system drive with protected access. The Land Reuse Team (or team lead) will use their email (atsdr.landreuse@cdc.gov) to send opt-in requests for the link to the secure survey. REDCap will store the survey information in the secure drive, which will be removed by the Land Reuse Team from the secure drive after three years. NOTE: REDCap is a secure web application [<https://www.project-redcap.org/>] for building and managing online surveys and databases. While REDCap can be used to collect virtually any type of data (including 21 CFR Part 11, FISMA, and HIPAA-compliant environments), it is specifically geared to support online or offline data capture for research studies and operations. The REDCap Consortium, a vast support network of collaborators, is composed of thousands of active institutional partners in over one hundred countries who utilize and support REDCap in various ways.

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

The project, entitled "Assessment of Environmental Health and Land Reuse Training" has been classified as human subjects research and CDC is engaged. The CDC IRB approval letter is provided in Attachment 5.

In the certification registration through TCEO and ATSDR's follow up (feedback) process, ATSDR will not ask any information that is sensitive, such as sexual identification, orientation, preferences or behaviors; social security numbers; medical conditions; or any other information that may be regarded as personal or sensitive.

A.12. Estimates of Annualized Burden Hours and Costs

ATSDR estimates that as many as 200 participants may complete the certificate course in the first year it is available, and it is reasonable to assume up to 200 participants will complete the certification course annually in future years. The estimate of 200 participants in the first year consists of a broad sector of environmental professionals: participants from ATSDR's cooperative state health agency partnerships, ATSDR representatives, Brownfields & Reuse Opportunity Working Network members (a federal and external workgroup), NEHA members or other environmental professionals (e.g. local health agency employees), and graduate students in planning, environmental, or public health disciplines. The maximum response rate is 100%. While it is reasonable to assume a 20% response rate, ATSDR wants to ensure that maximal participation is included as an option. This is based on the opportunity for cooperative state partners and students to participate in the training follow up, which may be required by their managers or professors.

Information collection may occur over a maximum of three years. The three-year window is to allow ATSDR flexibility in tracking the number of participants enrolling and taking the

course and providing feedback post-certificate. The estimated annual burden hours for this information collection is 67 hours.

Table 12.1 Estimated Annualized Burden Hours

Type of Respondents	Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Environmental health professionals and graduate students	Follow-up Survey	200	1	20/60	67

ATSDR used the U.S. Department of Labor National Occupational Employment and Wage <https://www.bls.gov/oes/home.htm>. Estimates in the United States website (United States Department of Labor, 2016) for median hourly wages for a variety of occupations. ATSDR selected the median hourly wage of \$40.81 for Environmental Engineers as representative of the professionals who may participate in the certification course. To determine the burden for students, ATSDR used the median hourly wage of \$21.25 for Environmental Science and Protection Technicians, Including Health category. ATSDR computed the hourly wage for the entire group as three-fourths professionals and one-fourth students ($\$30.61 + 5.31 = \35.92). The costs are shown in the table below.

Table 12.2 Estimated Annualized Burden Costs

Type of	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
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Respondent			
Environmental Health Professionals and Students	67	\$35.92	\$24,06.06
Total			\$24,06.06

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

There are no additional burden costs to respondents and record keepers. ATSDR is supplying all materials for the certificate course. There are no start-up costs.

A.14. Annualized Cost to the Federal Government

ATSDR has already created all materials that will be used in the certification course. NEHA has been awarded a contract amount of \$157,858.63 from ATSDR to produce the course in a training format. ATSDR's Project Officer overseeing the development of the certification course estimates a contribution of 2 hours per week over 20 weeks to the course development, and then 1 hour per week for the next 30 weeks to monitor progress of the course development. The Project Officer estimates a contribution of 1 hour per week for 50 weeks during years two and three of the certification course to monitor course progress, analyze participant information, and to potentially create a white paper, presentations, and/or commentary describing the certification course. Using a pay rate of \$45/hour, the total costs for the Project Officer during year one are projected to be \$3,150.00. During years two and three, the total costs for the Project Officer are projected to be \$2,250.00 each year. The total annualized Project Officer costs are projected to be \$7,650 over the three-year period, or an average of \$2,550 per year.

Table 14.1-Estimated Annualized Cost to the Federal Government

Expenditure	Cost
Contract	\$52, 619.54
ATSDR Salary	\$2,550
Travel for Site Visits	\$0
Total	\$55,169

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A.15. Explanation for Program Changes or Adjustments

There are no known program changes or adjustments at this time. This is a new data/information collection.

A.16. Plans for Tabulation and Publication and Project Time Schedule

ATSDR may prepare a joint presentation, short paper, or commentary about the use of the certificate course content and resources as well as any outcomes from the follow-up survey, such as an increase in the capacity of the certification course participants to conduct environmental health and land reuse activities.

Any publications or presentations prepared collaboratively by ATSDR and NEHA will be completed prior to the OMB expiration date. The suggested time schedule for any collaborative publications or presentations may start six to 12 months after the course is launched.

Table A.16.1 – Project Time Schedule

Project Time Schedule	
Activity	Time Schedule
Course launched and registration data summarized	0.5 - 1 months after OMB approval
Additional information/data collection	1—11 months after OMB approval
Analyses	12—18 months after OMB approval
Publication	18 - 24 months after OMB approval

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

The display of OMB expiration date is appropriate.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

References

- Jacobs, J. A., Duggan, K., Erwin, P., Borawski, E., & Compton, J. (2014). Capacity building for evidence-based decision making in local health departments: scaling up an effective training approach. *Implementation Science, 9*(1)1.
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