

Memo

To: Julie Wise, OMB
 Through: Mark Snyderman, ACL; Tomakie Washington, ACL
 From: Susan Jenkins, ACL
 Re: Non-Substantive Modifications to the Information Collection Tools for the *National Survey of Older Americans Act Participants (NSOAAP)*
 Date: 17 July 2019

In summary, ACL is not transitioning the NSOAAP to a longitudinal study and therefore will not use the previously approved out-year information collection tools. NSOAAP will remain a cross-sectional study using the OMB approved information collection tools (OMB Control Number: 0985-0023).

On January 1, 2019, OPE received Paperwork Reduction Act approval for the “National Longitudinal Survey of Older Americans Act Participants” (OMB Control Number: 0985-0023) – and this approval was to 1) update OMB on the anticipated timeliness related to the Terms of Clearance, and 2) alert OMB to non-substantive changes to the information collection instrument. The Terms of Clearance state:

Terms of the previous clearance remain in effect. Previous terms continue: OMB appreciates the thoughtful and rigorous manner in which ACL has developed plans to transition the National Survey of Older Americans Act Participants to a longitudinal study in order to provide added value to users and stakeholders. In order to align the OMB clearance process with the data collection schedule, ACL agrees to submit a one-year extension or revision request at the end of the current 3-year approval period, followed by a full 3-year clearance package when that one-year extension expires. At least 6 months prior to submission of the next 3-year OMB clearance package, ACL agrees to provide a report to OMB describing the initial results and lessons learned, as well as any revisions planned for the next round of OMB clearance.

This memo is **not** to initiate the revision request noted in the Terms of Clearance. The purposes of this memo are to alert OMB to the following: a) NSOAAP is not transitioning to a longitudinal study, b) NSOAAP no longer needs a one-year extension at the end of the current 3-year approval period as is stated in the Terms of Clearance, c) non-substantive changes have been made to the information collection instrument, d) NSOAAP is keeping the revisions to the study questions that were approved on 4/11/18 (OMB Control Number: 0985-0023, expires 4/30/21), and e) ACL still anticipates submitting a request to OMB to add a rotating module to the study.

Anticipated Timelines Related to the Terms of Clearance

Table 1 outlines ACL’s timing and actions related to the Terms of Clearance for the NSOAAP.

Table 1.		
PRA Package	Action	Date
Currently Approved	ACL submitted PRA Package for revision of a currently approved collection	2/22/18
Information Collection	OMB approved with change (OMB Control Number: 0985-0023, expires 4/30/21)	4/11/18
Instrument to be collected 2019-2021	ACL conducted cognitive testing of information collection tool	Summer/Fall 2018
	ACL submitted non-substantive modifications to OMB	12/18/18
	OMB approved with change (OMB Control Number: 0985-0023,	1/29/19

	expires 4/30/21)	
	ACL submitting non-substantive modifications to OMB	7/17/19
	ACL collects information with collection instrument	Summer 2019
	ACL submits revision request to add rotating module to the survey	September/ October 2019
	Anticipated OMB approval of rotating module	December 2019
	ACL collects information with collection instrument and rotating module	Summer 2020
Next 3-year Information Collection Instrument to be collected 2022-2024	ACL submits PRA Package for next 3-year clearance package and report on initial results, lessons learned, and planned revisions	Anticipated 6/1/20
	Anticipated OMB approval of next 3-year clearance package	12/1/20

Summary of Non-substantive Changes to the NSOAAP

Not transitioning to a longitudinal study

The NSOAAP is not transitioning from a cross-sectional to a longitudinal study and therefore will not use the out-year information collection tools. Based on recent ACL data collection efforts that encountered larger than expected attrition rates, the NSOAAP contractor recommended that the base sample be increased to assure nationally representative estimates would be available each year. This would require upfront work with Area Agencies on Aging to get larger client lists (i.e., increase burden) and approximately double the cost of the study. Rather than risk negatively impacting ACL's performance data, a decision was made to maintain the NSOAAP cross-sectional design.

Timing and Actions

Due to NSOAAP no longer changing from a cross-sectional to a longitudinal study, ACL no longer needs to request a 1-year extension or revision request at the end of the current 3-year approval period as is stated in the Terms of Clearance.

Approved Revisions

Although the NSOAAP is not transitioning to a longitudinal study, ACL is keeping the suggested question revisions that were a result of cognitive testing done in the summer of 2018 (OMB Control Number: 0985-0023, expires 4/30/21).

Non-Substantive Change

One revision that was not included in the original PRA package, but was discussed with OMB at a later date, was replacing the word 'gender' with 'sex' in two questions (see Table 2).

Rotating Module

A request to add a rotating module to the NSOAAP will be submitted to OMB in September/October 2019.

Table 2 includes the two sections of the information collection instrument with non-substantive modifications - column 1 is the original presentation and column 2 is the modified.

Table 2.	
Original	Modified
ASK IF NOT OBVIOUS: What is {your/NAME OF PARTICIPANT's/NAME OF CAREGIVER's} gender? (GENDER) MALE..... 1 FEMALE..... 2 REFUSED -7 DON'T KNOW -8	[ASK OF ALL]: What is {your/NAME OF PARTICIPANT's/NAME OF CAREGIVER's} sex? (DEGENDR) MALE.....1 FEMALE.....2 REFUSED.....-7 DON'T KNOW.....-8
[DON'T ASK IF OBVIOUS] What is {CARE RECIPIENT'S} gender? (CGPMF) Male.....1 Female.....2 REFUSED.....-7 DON'T KNOW.....-8	[ASK OF ALL] What is {CARE RECIPIENT'S} sex? (CGPMF) Male.....1 Female.....2 REFUSED.....-7 DON'T KNOW.....-8