Formative assessment of the information needs of adapting NIOSH-CPWR toolbox talks for Spanish-speaking construction workers: Phase 1

Supporting Statement-Section A

OMB No. 0920-1154

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List of Attachments

- I. Authorizing Act
- II. Signed NIOSH IRB Determination Form
- III. Focus Group Guide
- IV. Consent Form
- Goals of the project: To collect preliminary information to inform the development of communication products to reduce work-related injuries among Spanish-speaking construction workers
- Intended use of the resulting data: Internal use to develop communication products to reduce work-related injuries among Spanish-speaking construction workers
- Methods to be used to collect data: Cognitive testing in a focus group setting
- **The subpopulation to be studied:** Spanish-speaking construction workers
- How data will be analyzed: Qualitative analysis of the cognitive testing results to identify
 more easily understood language and phrasing

Section A-Justification

1. Circumstances making the collection of information necessary

The Centers for Disease Control and Prevention (CDC), National Institute for Occupational Safety and Health (NIOSH) seeks approval from the Office of Management and Budget (OMB) to conduct formative research focus groups with Spanish-speaking construction workers who are at increased risk for work-related injuries. These focus group discussions will be conducted by a contractor for NIOSH.

Construction is one of the most dangerous industry sectors in which to be employed. There are approximately 1.8 million Spanish-speaking workers employed in construction, and Latino workers are injured and killed at rates 2 – 3 times higher than non-Latino construction workers. Among the challenges to meeting the occupational safety and health (OSH) needs of the construction industry is the large number of small businesses,

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with approximately 90% of small construction contractors employing 20 or fewer workers (NIOSH & ASSE, 2015). Over 40% of Spanish-speaking construction workers work for businesses employing 10 or fewer workers. Latino workers are more likely to be employed in small establishments, and small establishments have a higher risk of fatal injuries. In 2010 alone, 56.3% of construction deaths occurred in establishments with fewer than 20 employees, yet such establishments employed just 41.4% of the construction workforce (CPWR, 2013). From 2003 to 2008, small establishments with 1-10 employees reported an average of 47% work-related deaths among Latino workers, while employing 44% of the Latino construction workers (Dong et al., 2010). These small construction contractors have limited resources to apply to OSH training needs.

A challenge identified by previous NIOSH and CPWR activities with Latino immigrants is that merely translating documents into proper Spanish often fails to produce documents that are comprehensible to immigrant workers. In addition to having lower educational levels, many Latino immigrants refer to construction materials and activities using Spanglish – a hybridized mixture of Spanish and English. Many do not know construction terminology in Spanish, as they did not work in construction in their homelands. In the first phase of this project, iterative rounds of cognitive testing of the translated toolbox talks will be conducted. During the process of cognitive testing, participants will be asked not only if they understand a term, but also whether that is the term popularly used on their worksites. If not, they will be asked what term(s) they do use.

2. Purpose and Use of the Information Collection

The purpose of conducting these formative research focus groups is to cognitively test draft translations of Spanish-language toolbox talks to identify more easily understood terminology and/or phrasing. This information will be used internally to inform the development of more effective resources for these workers.

Eight focus groups with up to 9 participants each will be conducted by the contractor. The eight focus groups will consist of native Spanish-speaking construction workers age 18 and older.

Questions in the focus group guide ask respondents to provide feedback on the following topics (also see Attachment III):

- 1. Knowledge of and experiences related to workplace safety
- 2. Whether the information presented in sample toolbox talks is understandable and useful
- 3. If they have any suggestions regarding wording or phrasing that would make the Spanish-language toolbox talks easier to understand and/or more useful

3. Use of Improved Information Technology and Burden Reduction

The focus groups will include workers from the construction industry. A contractor will recruit the focus group participants. Individuals who would like to volunteer will be selected based on the eligibility criteria of the focus group (native Spanish-speaker, age 18 or older, and currently employed in the construction industry). The focus group will include female workers that represent the female proportion of the worker population in the construction sector. The contractor will recruit potential participants from pre-existing lists of workers in the construction sector; therefore, no personally identifiable information (PII) will be collected nor provided to NIOSH. All the information collected will be used internally for product development and improvement.

4. Efforts to Identify Duplication and Use of Similar Information

No similar information has been gathered by or maintained by NIOSH or other Federal agencies and is not available from other known sources.

5. Impact on small Businesses or other small entities

Workers from small business or other small entities may be involved in these efforts but the contractor will minimize the burden on them during information collection by scheduling focus groups dates and times that work for participants, asking for readily available information, and using short, easy-to-complete information collection instruments. The burden on respondents has been reduced and minimized using an efficient and effective focus group guide.

6. Consequences of collecting the information less frequently

This request is for a one-time data collection. There are no legal obstacles to reducing the burden. This formative research will aid in the understanding of the information needs to reduce work-related injuries among Spanish-speaking construction workers. Data will be used to inform the development of draft educational products to aid in awareness and prevention. Without this focus group data, knowledge gaps will not be identified, and researchers will not have adequate information to develop effective educational materials for Spanish speaking construction workers.

7. Special Circumstances Relating to the Guidance of 5 CFR1320.5

There are no special circumstances with this information collection package. 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 the Agency

The Federal Register Notice was published for this collection on July 18, 2016, Vol. 81, No. 137, pp. 46680. No public comments were received.

This project builds upon a long-standing NIOSH collaboration with the Center for Construction Research and Training (CPWR). This collaboration allows leveraging of both CPWR and NIOSH efforts to reduce work-related injuries among Spanish-speaking construction workers and eliminates duplication of data collection. The collaboration allows for better integration of expertise and science provided by both agencies and will greatly increase the reach of any developed educational materials by partnering with CPWR's distribution network. Previous research by both NIOSH and CPWR indicate a great need for training materials accessible to Spanish-speaking construction workers and which can be easily implemented by small construction companies. Previous interviews with small construction companies conducted by CPWR indicate a great deal of interest in the proposed project.

9. Explanation of Any Payment or Gift to Respondents

The focus group participants will be given an incentive of \$40.00 to encourage participation.

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

This submission has been reviewed by the NIOSH Information Systems Security Officer, who determined that the Privacy Act does not apply because no personally identifiable information will be collected. This data collection was determined not be research involving human subjects by the NIOSH Division of Science Integration Associate Director for Science.

Participation in the focus groups is voluntary. Participants will be provided with an informed consent form prior to the start of focus group and will be allowed to ask questions about the project before deciding whether to participate or not. The consent form describes the purpose of the project, how the information they provide will be used, and how their privacy and confidentiality will be protected. The contractor will recruit potential

participants from pre-existing lists of personnel; therefore, no new PII will be collected. These pre-existing lists will be from previous data collection activities the contractor has performed with the target population.

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

No information will be collected that is of a personal or sensitive nature. The proposed data collection was reviewed by the NIOSH Division of Science Integration Associate Director for Science and determined to be a non-research project that does not need further IRB review. Please see the attached NIOSH IRB determination form (Attachment II).

12. Estimated of Annualized Burden Hours and Costs

Each focus group will be 90 minutes and will have up to 9 participants. The median hourly wage is estimated to be \$16.74 for construction workers based on the most recent (May 2018) National Occupational Employment and Wage Estimates for all occupations, published on the Bureau of Labor Statistics website: https://www.bls.gov/ooh/construction-and-extraction/construction-laborers-and-helpers.htm

Table A.12.A Annualized Burden Hours

Type of Respondent	Form Name	Number of Respondents	Number of Responses per Respondent	Average Hours Per Response	Total Response Burden (Hours)
Spanish- speaking Construction Workers	Focus group guide	72	1	1.5	108
Total		72			108

Table A.12.B Annualized Cost

Activity	Total Burden Hours	Hourly Wage Rate	Total Respondent Cost
Focus groups/cognitive testing	108	\$16.74	\$1807.92

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

There are no other costs to focus group participants or record keepers. There will be no direct cost to the focus group participants other than their time to participate in the data collection activity.

14. Annualized Cost to the Government

Expense Type	Expense Explanation	Annual Costs (dollars)
Direct Costs to the Federal Government	CDC Project Officer (GS-11, 0.10 FTE)	\$8,720
rederal Government	CDC Project Officer (GS-14, 0.10 FTE)	\$18,327
	Subtotal, Direct costs	\$27,047
Cooperative Agreement or Contract	Contracts	\$48,024
	TOTAL COST TO THE GOVERNMENT	\$75,071

15. Explanation for Program Changes or Adjustments

This is a new information collection request; therefore, program changes and adjustments do not apply.

16. Plans for Tabulation and Publication and Project Time Schedule

Date	Item Description
April, 2020	Receive OMB approval
May, 2020	Task 1: Develop project plan and recruit for focus groups
July, 2019	Task 2: Conduct cognitive testing focus groups with Spanish-speaking construction workers
August, 2020	Task 3: Generate summary report of findings from cognitive testing focus groups

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

The OMB Expiration Date will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification. These activities comply with the requirements in 5 CFR 1320.9.

References

CPWR. (2013). The construction chart book: The U.S. construction industry and its workers, 5th ed. http://www.cpwr.com/publications/construction-chart-book

Dong, X.S., Wang, X., & Daw, C. (2010). Fatal and nonfatal injuries among Hispanic construction workers, 1992-2008. CPWR Data Brief, 2(2):1–19.

NIOSH, & ASSE. (2015). Overlapping vulnerabilities: the occupational safety and health of young workers in small construction firms. By Flynn, M.A., Cunningham, T.R., Guerin, R.J., Keller, B., Chapman, L.J., Hudson, D., Salgado, C. Cincinnati, OH: U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health, DHHS (NIOSH) Publication No. 2015- 178.