

# Supporting Statement A

## Questionnaire and Data Collection Testing, Evaluation, and Research for the Health Resources and Services Administration (HRSA)

OMB Control No. 0915-0379

### A. Justification

#### 1. Circumstances Making the Collection of Information Necessary

The Health Resources and Services Administration (HRSA) has approval under the generic clearance, Office of Management and Budget (OMB) Control No. 0915-xxxx, to conduct cognitive and pretesting to facilitate HRSA's efforts to (1) employ evaluation-type methods and techniques to improve HRSA's current data collection and estimation procedures, (2) develop new collections and procedures, and (3) revise existing collections and procedures. . This is a request for OMB approval under HRSA's generic clearance.

Please provide description of the information collection activities. If this collection is related to the Affordable Care Act, please note.

Describe the objective(s) of the information collection activities.

#### 2. Purpose and Use of Information Collection

Who uses this information and for what purpose?

- The information in this section and in number 1 above will be the backdrop for reviewers to use in assessing the appropriateness and adequacy of the sample design, data collection plans and analysis plans. Make sure the need/uses of the information collection are consistent with the design (i.e., do not promise more than the information collection can deliver).
- Specific, concrete examples of how the information is or has been used should be given, if the request is for an information collection that has been approved previously, or how it will be used if it is a new activity. Care should be taken to **avoid broad, general statements** about research, or descriptive analyses. There should be a specific planned use, by a Federal program, for the resulting information. **This material is important, because projects are sometimes disapproved on the basis that they lack "practical utility."**

The program may also explain the consequences that can occur if the data is **not** collected.

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

- Was there any consideration of using technology to reduce burden? How can HHS use

technology to improve this information collection?

- Describe whether, and to what extent (% of responses), the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection.
- Also, describe any consideration of using information technology to reduce burden. Describe any special data collection procedures which are designed to reduce the burden to the respondent. Example: Computer Assisted Telephone Interview (CATI). Even if you will not be using any such special procedures, show that you will collect only the minimum information necessary for the purposes of the project. Electronic respondent reporting has become an important issue at OMB. The Government Paperwork Elimination Act (GPEA), Public Law 105-277, title XVII, was signed into law on October 21, 1998. GPEA requires Federal agencies, to allow individuals or entities that deal with the agencies the option to submit information or transact business with the agency electronically, when practicable, and to maintain records electronically, **when practicable.**

Its goal is to encourage agencies to incorporate technologically improved respondent reporting as this process typically lowers burden to the respondent. Therefore, all decisions NOT to utilize electronic respondent reporting must be strongly justified.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

Identify whether this information is duplicative of another information collection. Describe efforts to identify duplication: Literature searches, data base searches, attendance at national meetings, consultations with other HHS agencies, etc. assist in determining that similar data collection is not being conducted by another institution. Show specifically why any similar information already available cannot be used or modified for use for the purpose(s) described in 2 above.

#### **5. Impact on Small Businesses or Other Small Entities**

- If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.
- OMB encourages development and use of "short forms" for information collection from small organizations. Most HHS data collections require all respondents to complete the entire questionnaire. However, specifically state if the proposed data collection was created so that a small organization will skip more of the questions than a large organization.
- If this is not the case it can usually be stated that the information being requested or required has been held to the absolute minimum required for the intended use of the data.

**Note: Physicians and Dentists are considered small business. Indicate how burden will be kept to a minimum.**

**If data collection will not occur from small businesses, state the following: *No small***

***businesses will be involved in this study.***

**6. Consequences of Collecting the Information Less Frequently**

- What will happen if this information is collected less frequently? Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.
- State how often respondents will respond to the data collection i.e., quarterly, annually, as necessary, etc. or one-time only.
- Justify why respondents must report at the stated frequency.

**If there are no legal obstacles to reduce the burden include the following sentence: “There are no legal obstacles to reduce the burden.” Otherwise, address the obstacles.**

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

Data collections conducted under this generic clearance will be consistent with the general information collection guidelines of 5 CFR 1320.5. No special circumstances apply.

**8. Comments in Response to the Federal Register Notice/Outside Consultation**

**Section 8A:**

As required by 5 CFR 1320.8(d), a 60-day Federal Register Notice was published in the *Federal Register* on December 11, 2013, vol. 78, No. 238; pp. 75353. No substantive comments were received.

**Section 8B:**

HRSA will consult with statistical and other expert staff in-house, in other Federal agencies, and in other organizations that have conducted, or may engage in similar preliminary research activities. Proposals for information collection under this generic clearance will be developed by program offices and submitted for review and approval by the Office of Planning, Analysis, and Evaluation (OPAE) in HRSA. OPAE directs the OMB information collection clearance program for HRSA, as well as other data policy and planning activities within HRSA. The HRSA information collection clearance officer is a social science analyst with expertise in survey methodology and questionnaire design, and familiarity with principles of sampling and data analysis.

**9. Explanation of any Payment/Gift to Respondents**

- Explain any decisions to provide payments or gifts to the respondents.
- Provide a justification for remuneration of respondents. Include citations of previous work where remuneration successfully improved response rates in a population similar to that in the proposed data collection. Be realistic in the amount of remuneration requested. Remuneration is not used as a reimbursement of a respondent’s time or burden on the respondent (e.g. transportation, lunch, etc.)

## **10. Assurance of Confidentiality Provided to Respondents**

Data will be kept private to the extent allowed by law. 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.

## **11. Justification for Sensitive Questions**

- Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.
- This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent. State the nature of any sensitive questions (i.e. sexual practices, alcohol or drug use, religious preference, etc.) and provide justification for their use.
- Consider if the collection of SSN and personal identifiable information (PII) data is still necessary for this request moving forward. Consider if the program needs to collect SSN or PII or can another identifier be utilized or developed.
- **Justify the need for a respondent's social security number (SSN).** If you ask for a respondent's SSN, you must include a script for informing the respondent the following: 1) the statute which authorizes OS to solicit the SSN, 2) how the SSN will be used, and 3) whether the respondent's disclosure of the SSN is mandatory or voluntary. **This information must appear on the data collection form or on a separate form that the respondent can keep.**

**OMB considers asking a respondent about their race/ethnicity as sensitive.** If these questions are asked, explain why this is important to the survey. **HHS requires that race and ethnicity be collected all HHS data collection instruments.** If the program can give a strong argument why they collection of race and ethnicity would be too burdensome, they must explain why in this section.

## **12. Estimates of Annualized Hour and Cost Burden**

*Respondents:*

Provide information on the number and type of respondents that this survey is targeting. Indicate the type of respondents, number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden for customary and usual business practices. A **'respondent'** includes individuals; partnerships;

associations; corporations; business trusts; legal representatives; organized groups of individuals; and State, territory, tribal or local governments. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens ‘**Number of Responses per Respondent**’ means the number of times the same respondent will be contacted for data collection (i.e. quarterly reports would be 4 responses per respondent and monthly reports would be 12 responses per respondent.) Some programs mistakenly place the number of questions in the data collection instrument. Please keep the proper definition in mind.

**Please Note: If respondents are required to be screened prior to being included in the project, the screening burden has to also be accounted for.** To estimate the burden hours per form/respondent, multiply the number of respondents by the number of responses per respondent by the burden per response.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. **The cost to the federal government for contracting out or paying outside parties for information collection activities should not be included here. Instead this cost should be included in Item 14.** The Department of Labor website can be used to determine appropriate wage rates for respondents (<http://www.bls.gov/bls/blswage.htm>).

*Annual burden estimates:*

Type of Collection	Number of Respondents	Responses per Respondent	Total Responses	Hours per Respondent	Total Burden Hours	Wage Rate	Total Hour Cost
Name of instrument							
Total							

Provide a short narrative summarizing the burden table.

*Planned frequency of information collection:*

Provide response.

**13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

- Total cost of capital and cost of maintaining capital associated with this information collection. These capital items only refer to systems that the respondent would not purchase or maintain in the absence of this information collection. Provide an estimate of the **total annual cost burden** to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Item 12.B and 14). **If a multi-year approval is sought, but data collection will occur in**

**only the first year, the number of respondents and burden hours still must be annualized over the total number of time being requested for approval. We would not receive multi-year approval for a data collection that will only take 1 year to complete.** The cost estimate should be split into two components; (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred.

- Capital and start-up costs include, among other items: preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities. If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services would be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate. Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995 (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government or (4) as part of customary and usual business or private practices.

**If there are no costs to respondents, you can say “There are no direct costs to respondents other than their time to participate in the study.”**

#### **14. Annualized Cost to Federal Government**

- Total cost to the Federal Government for this information collection. Provide estimates of all annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.
- **Estimate government costs for contracted data collection by adding the contract costs plus the personnel costs of federal employees involved in oversight and/or analysis.**

The cost is to be an **average annual** cost. If the project is a multi-year project, indicate the total cost of the project, the number of years covered, and the resulting annualized cost. If funds are transferred to the OS budget from another agency, state the amount involved and the agency providing the funds. If 1% evaluation funds are used, say so.

#### **15. Explanation for Program Changes or Adjustments**

Not Applicable. This is a new activity under HRSA's generic clearance and will be included in the total burden currently approved by OMB under OMB Control No. 0915-xxxx.

**16. Plans for Tabulation, Publication, and Project Time Schedule**

Provide response. Include timeline of activity, data collection procedures and data analysis. Complete Supporting Statement B.

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

No exemption is being requested. The expiration date will be displayed.

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

Not applicable. There are no exceptions to the certification.