

ADMINISTRATION ON COMMUNITY LIVING
ANNUAL SMP/SHIP NATIONAL TRAINING CONFERENCE
CUSTOMER SATISFACTION SURVEY

REQUEST FOR OMB APPROVAL

**SUPPORTING STATEMENT, AS REQUIRED UNDER THE PAPERWORK REDUCTION ACT
AND 5 CFR 1320**

Background

The Office of Healthcare Information and Counseling (OHIC) hosts an annual national training conference for the federally funded programs that it administers. The audience for this training conference includes attendees from State Health Insurance Assistance Program (SHIP) and Senior Medicare Patrol (SMP) programs, which are two nationally recognized programs that provide Medicare information and counseling to Medicare beneficiaries and help, fight Medicare fraud through prevention and education. Grantee leadership is required to attend this training annually to ensure they receive critical information and technical assistance needed to help them successfully meet the requirements of their grant awards. Grantees are encouraged to bring up to three (3) people from each program. Programs operate in each of the 50 states, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

Section 4360(f) of OBRA 1990 created the State Health Insurance Assistance Program (SHIP) and requires the Secretary to support a national network of grantees to provide outreach and assistance to Medicare beneficiaries. In addition, under Public Law 104-208, the Omnibus Consolidated Appropriations Act of 1997, Congress established the Senior Medicare Patrol Projects in order to further curb losses to the Medicare program. The Senate Committee noted that retired professionals, with appropriate training, could serve as educators and resources to assist Medicare beneficiaries and others to detect and report error, fraud and abuse. This tool provides ACL an opportunity to assess the success and impact of the training provided to the SHIP and SMP grantees by ACL along with determining the future training needs of the program grantees.

Section 301 of the Public Health Service Act (42 U.S.C. § 241) is the authorizing law for data collections within the Department of Health and Human Services (HHS). Specifically, agencies within HHS should “collect and make available through publications and other appropriate means...research and other activities.”

The March 3, 1998 White House Memorandum, “Conducting Conversations with America to Further Improve Customer Service,” directs agencies “to track customer service measurements, then take necessary actions to change or improve how the agency operates, as appropriate. Integrate what your agency learns from its customers with your agency's strategic plans, operating plans, and performance measures required by the Government Performance and Results Act of 1993, reporting on financial and program performance under the Chief Financial Officers Act of 1990, and the Government Management Reform Act of 1994.”

The information collected in this survey is necessary to ensure that ACL is meeting the technical assistance needs of the attendees and to capture valuable feedback to be used for future training meetings. By gathering feedback on the quality of the training and content provided, we can ensure attendee satisfaction and gather information for future planning. ACL administers a contract to develop and provide the training conference evaluation tool for ACL’s approval.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The information obtained from this survey will be used by federal employees of the Administration for Community Living (ACL), part of the Department of Health and Human Services. Specifically, the information will be used to assess grantee satisfaction with the Annual SMP/SHIP National Training Conference. The results of the survey could lead to overall programmatic and training improvements, including the reallocation of resources, revisions to certain programmatic processes and policies, and/or development of guidance related to agency and federal partner policies and procedures. The results of the survey could also lead to improvements for Medicare beneficiaries, as improved customer service by the agency and grantees will lead to more appropriate Medicare choices for individual citizens, leading to monetary savings for both the individual and the SMP/SHIP programs. Ultimately, these changes could improve the services ACL provides to the public.

3. Describe whether, and to what extent, 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.

This event evaluation will be electronic/internet-based. OHIC's event contractor will prepare and test this tool, and will disseminate the link to this voluntary evaluation to event participants at the end of each event day. The contractor will also provide timely technical assistance to event participants to have information technology needs. At time of submittal to OMB ACL is also including measures related to virtual conference activities due to the COVID-19 pandemic.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This effort does not duplicate any other survey collection by ACL. ACL has not previously performed any data collections related to satisfaction with Annual SMP/SHIP National Training Conference. There is no known redundancy with this data collection.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection has no impact on small businesses or other small entities.

6. 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.

Without this information collection, ACL would not be able to measure satisfaction with Annual SMP/SHIP National Training Conference presentations and would be limited in its ability to implement improvements. Assessing how grantees value the information they receive during this event will allow for the development of future event enhancements. In addition, ACL would not be able to meet the legal requirements pertaining to data collection and continuous improvement, including the March 3, 1998 White House Memorandum, E.O. 12862, and the Section 4360(f) of OBRA 1990.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**

- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection of information is consistent with 5 CFR 1320.5(d)(2), and there are no special circumstances with respect to reporting.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

A 60-Day Federal Register Notice was published in the Federal Register on January 21, 2020, vol. 85, No. 26; pp 7309-7310. ACL received an email from a grantee related to the current COVID-19 pandemic requesting the 2020 event be held virtually. Though it is essential for this event to be held in-person and to bring together national partners from across the country each year, this year's COVID-19 pandemic has halted all in-person event capability.

ACL worked with an internal group and external partners to verify the language and length of the survey instrument. Language for this survey was based on previous Annual SMP/SHIP National Training Conference evaluations and related feedback from past attendees, planning committees, and contractors was included to ensure effective, brief length and wording.

A 30-day Federal Register Notice published in the Federal Register on June 24, 2020, vol. 85, No. 122; pp 37952.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

The Agency will not provide payment or other forms of remuneration to participants.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

There are no assurances of confidentiality. In addition to complying with these legislative standards, ACL will also take steps to explain to individual respondents the need for and value of this data collection. No confidential or personal identifiable information (such as name or phone number) is associated with this information collection. Respondents will be informed of this fact during the survey announcement at each group education session.

11. 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.

No questions will be asked that are of a personal or sensitive nature as defined by OMB.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- *** Indicate the 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 hours for customary and usual business practices.**

- *** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- *** Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

For this project, ACL will collect data once following the Annual SMP/SHIP National Training Conference. This evaluation will be sent to all event attendees, which is estimated to include maximum 364 participants. This is a voluntary survey and attendees are encouraged not required to complete this evaluation. Participants will be allowed one submission, only. ACL expects to obtain a maximum of 364 survey responses, and each survey is estimated at .25 hours to complete.

This time estimate is based on research performed by ACL with the existing survey instrument and in consideration of previous survey content and length.

The target number 324 is a result of 54 states/territories, each sending 6 conference participants who may be eligible to complete a survey ($54 \times 6 = 324$). We have factored in an additional 40 non-grantee, non-federal partner event participants ($324 + 40 = 364$). Multiplying the 364 by 15 minutes (.25) results in a total of 5,460 maximum burden minutes (91 hours) to complete this data collection.

Estimates of annualized cost to respondents for the hour burdens for the survey are estimated at \$4,227.86. All survey responses will come from individuals who attended Annual SMP/SHIP National Training Conference sessions. Because there are no specific expectations in terms of employment status or experience, all individuals will be charged at the rate for “All Occupations,” of \$23.23/hour, as defined by the Bureau of Labor Statistics’ “Occupational Employment Statistics.” This number is increased by a factor of 100% to account for benefits and overhead, resulting in a rate of \$46.46/hour.

As a result, ACL estimates an approximate aggregate cost to respondents of \$4,227.86 each year. This estimate is based on the per hour valuations of respondents’ time noted in table A-12-2.

The complete estimated, annualized burden can be seen in Table A-12-1:

Table A-12-1. Total Estimated Annualized Burden Hours			
Number of Respondents	Responses per Respondent	Average burden hours per response	Total Burden Hours

364	1	15 minutes	91
-----	---	------------	----

The Department of Labor website was used to determine appropriate wage rates for respondents (see Table A-12-2).

Table A-12-2. Estimated Annualized Cost to Respondent for the Hour Burdens		
Total Burden Hours	Hourly Wage Rate*	Total Respondent Costs
91	\$46.46	4,227.86

*Source: U.S. Department of Labor, Bureau of Labor Statistics. Based on median hourly rates for occupations closest to each category of respondent. Available at: http://www.bls.gov/oes/current/oes_nat.htm

13. Provide an estimate for 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 Items 12 and 14).

ACL has not identified any capital, start-up, or maintenance of capital costs associated with this proposed collection of information.

14. Provide estimates of annualized costs to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

This project will occur once annually. Major fluctuations in cost are not expected, totals are based on the 2020 OPM wages and summary tables and contractor costs. The estimated annual cost to the Federal Government totals \$9,536.80.

An ACL staff member at a GS-15/5 taking two hours at the rate of \$ 77.59 for a total of \$155.18.

A GS-14/5 taking 15 hours at the rate of \$65.88 for total of \$988.20.

A GS-14/5 taking two hours at the rate of \$65.88 for a total of \$ 131.76

A GS-14/5 taking two hours at the rate of \$65.88 for a total of \$ 131.76.

A GS-13/5 taking two hours at the rate of \$55.75 for a total of \$111.50.

Grade	Hours	Rate	Total Cost
GS 15	2	\$ 155.18	\$ 310.36
GS 14	15	\$131.76	\$ 1976.4
GS 14	2	\$131.76	\$ 263.52
GS 14	2	\$131.76	\$263.52
GS 13	2	\$ 111.5	\$ 223.00
Total Fed Gov Costs	23		\$ 3036.8

ACL expects the survey's contractor costs to be approximately \$6,500 annually. This amount includes all costs related to reporting, survey administration, survey development, and communication between the contractor and ACL. Contractor hour estimates are based on previous survey projects conducted by the contractor, including similar projects for HHS. Hourly labor charges are based on existing Mission Oriented Business Integrated Services (MOBIS) rates. Rates for the contractor staff involved with this project vary from \$150/hour to \$285/hour.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new data collection, there is a program change increase of 91 annual burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

A maximum of 364 event participants from 54 states and/or territories will be surveyed once over one year. An internal report will be prepared once all submissions have been received, calculated, and analyzed. At this time, ACL does not plan to make this report public, but will

¹ Source: OPM 2020 Salary Table https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx. All Grades are listed at Step 5 and include an additional 100% for fringe benefits and overhead.

supply states/territories with an analysis of overall event satisfaction results via webinar presentation and word-of-mouth.

Assuming this project has been approved and is ready to begin on July 15, 2020, the following timeline would be applicable (any shifts to the approval date will have a corresponding impact on the dates listed in Table A-16-1):

Table A-16-1: Annual SMP/SHIP Training Conference Time Schedule

Survey Phase	#	Task	Year 1	Year 2	Year 3
Preparation	1	Finalization of evaluation	7/15/20	7/15/21	7/15/22
	2	Evaluation training	7/22/20	7/22/21	7/22/22
Administration & Analysis	3	Training Conference	7/21/20 – 7/23/20	7/21/21 – 7/23/21	7/21/22 – 7/23/22
	4	Evaluation link disseminated	7/23/20	7/23/21	7/23/22
	5	Evaluation submission deadline	8/6/20	8/6/21	8/6/22
	6	Analysis	8/7/20	8/7/21	8/7/22
	7	Conclusion of analysis	10/7/20	10/7/21	10/7/22
Reporting	8	Report disseminated internally	10/8/20	10/8/21	10/8/22
	9	Report results disseminated externally	10/10/20	10/10/21	10/10/22

OHIC staff will notify attendees about the opportunity to complete an evaluation at the conclusion of each event presentation. Event contractors will be available to answer questions or provide assistance if requested, but will not otherwise interact with the respondents or supply or suggest answers.

Materials related to survey completion (computer, internet access) will be provided by event participants. After the event, event contractor will compile and aggregate completed survey results. OHIC staff will provide ongoing technical assistance as needed.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

ACL will display OMB's expiration date on the survey. ACL will notify respondents that this is an approved collection and will identify the OMB approval expiration date on the survey

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification.