ADMINISTRATION ON COMMUNITY LIVING

SHIP–SMP SURVEY OF GROUP OUTREACH AND EDUCATION EVENTS

REQUEST FOR OMB APPROVAL

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

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 301 of the Public Health Service Act [1](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[2]," 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."

Executive Order (E.O.) 12862[3] (September 11, 1993) is aimed at "ensuring the Federal Government provides the highest quality service possible to the American people." The E.O. discusses surveys as a means for determining the kinds and qualities of service desired by the Federal Government's customers and for determining satisfaction levels for existing service. These voluntary customer surveys will be used (1) to ascertain customer satisfaction with individuals attending group outreach and education events conducted by the State Health Insurance Assistance Program (SHIP) or the Senior Medicare Patrol (SMP) program and (2) to report on annual performance goals as described in Government Performance Results Act

[1] Attachment 1: Section 301 of the Public Health Service Act
[2] Attachment 2: Memorandum on Conducting Conversations with America to Further Improve Customer Service
[3] Attachment 3: Executive Order (E.O.) 12862

(GPRA; Pub.L. 103-62)-related documents. These results are used internally, and summaries are provided to the Office of Management and Budget (OMB) on an annual basis and are used to satisfy the requirements and spirit of E.O. 12862.

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 and regional 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 customer satisfaction with group outreach and education events that are conducted by the SHIP and SMP programs. The results of the survey could lead to overall agency improvements, including the reallocation of resources, revisions to certain agency processes and policies, and/or development of guidance related to the agency’s customer services. The results of the survey could also lead to improvements for individual Medicare beneficiaries, as improved customer service by the agency will lead to more appropriate Medicare choices for individual citizens, leading to monetary savings for both the individual and the SHIP/SMP program. Ultimately, these changes should improve the services ACL provides to the public.

In addition, ACL will use this data to fulfill the requirements of the Government Performance and Results Modernization Act of 2010 (GPRAMA; Pub.L. 111-352). The GPRA Modernization Act requires ACL to report annually on their progress towards achieving specific performance goals. Results from this survey will help to determine new performance goals and assess existing goals.

The existing version of this survey only applied to the SMP program, but those results have been used to enhance state-specific services, as individual state/territory programs have been able to identify the level of satisfaction their customers have with the specific agency. In addition, one programmatic result has been the strong positive relationship between a respondent’s view of the information they receive during an SMP event and his/her overall satisfaction. This result has placed an emphasis on the quality of information delivered to SMP event attendees.

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 survey does not involve the use of electronic collection techniques, such as an internet-based survey. Letter-size (8.5" x 11") comment cards with large font types for easy review and visibility will be distributed to participants at the conclusion of randomly selected outreach and education events, where attendees will have the opportunity to voluntarily complete a survey. The ability to provide instant feedback on-site reduces the need for an electronic survey instrument.

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 HHS, ACL, or any other federal agency.

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 group outreach and education events and would be limited in its ability to implement improvements. Assessing how beneficiaries value the services and information they receive will allow for the development of program 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 GPRA Modernization Act of 2010 (Pub. L. 111–352).

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 published in the Federal Register on December 30, 2019, vol. 84, No. 249; pp 71953-71954.[4] There were no public comments.

In addition to conducting the survey and interacting directly with state presenters over the past three years, ACL collects more direct feedback during its annual SHIP-SMP conference, where contractors supporting this survey effort have worked directly with state officials to review survey findings, identify recommended improvements, and understand challenges. One of the primary pieces of feedback received from this consultation has been the importance of surveying events year-round. This feedback has been incorporated into this renewal package.

[4] Attachment 4: 60-day Federal Register Notice – vol. 84, No. 249; pp 71953-71954.

A 30-day Federal Register Notice published in the Federal Register on June 24, 2020, vol. 85, No. 122 pp 37951.

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.

ACL remains compliant with legislative standards and takes 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 are informed of this fact during the survey announcement at each group outreach and 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.**
- ***<u>* 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.</u>***
- *** 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 establish a rolling nine-month data collection period, with three months in each year reserved for training, preparation, and survey reporting. During the nine-month collection period each state or territory will be required to survey at least one group outreach and education event conducted by its SHIP program, and one outreach and education event conducted by its SMP program. Those two events will only be counted if they occur at two separate locations and involve two separate presenters.

States/territories will have the option of collecting additional information throughout the nine-month period but will not be required to do so.

Each year, ACL expects to obtain an average of 1,200 completed surveys of beneficiaries that have attended a group education or outreach event (600 SHIP and 600 SMP). These completed surveys will represent a random sample of individuals attending group outreach and education events, with each survey response requiring five (5) minutes to complete. This time estimate is based on research performed by ACL with the existing survey instrument.

The target number 1,200 is a result of 54 states/territories conducting two events per year (one SHIP, one SMP), with each event resulting in 11 completed surveys[5] (54 x 2 x 11 = 1,188[6]). Multiplying the 1,200 responses by 5 minutes (5/60) results in a total of 100 burden hours per year to complete this data collection.

The survey is repeated every year over three years to allow ACL to monitor trends in satisfaction from attendees of group outreach and education events.

All survey responses will come from individuals who attend group outreach and education events presented by the local SHIP or SMP program. Because there are no specific expectations in terms of employment status or experience, all individuals are charged at the rate for “All Occupations,” which is $24.98/hour, as defined by the Bureau of Labor Statistics’ “Occupational Employment Statistics.”

As a result, ACL estimates an approximate aggregate cost to respondents of $2,498 each year. This estimate is based on the per hour valuations of respondents’ time noted above and the projected 100 burden hours.

The average number of 1,200 completed surveys will correspond with the number of individuals volunteering to complete a survey at select education events. The complete estimated, annualized burden can be seen in Table A-12-1:

[5]During the first three years of the SMP survey an average event generated 11 completed surveys.
[6] A final estimate of 1,200 is used by rounding up the actual calculation of 1,188 to the nearest 100.

Table A-12-1. Total Estimated Annualized Burden Hours			
Number of Respondents	**Responses per Respondent**	**Average burden hours per response (hours)**	**Total Burden Hours**
1,200	1	0.83 (5 minutes)	100

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**
100	$24.98	$2,498

*Source: U.S. Department of Labor, Bureau of Labor Statistics. Based on mean 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 recordkeepers 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 survey project will occur over a three-year period. Major fluctuations in cost are not expected. Costs to the Federal Government total $166,866.16 annually.

The total Federal burden hours for five staff members spent reviewing and analyzing the program data estimated to be 916 hours annually.

A GS-15 step 1 hourly rate of $68.38 per hour[7] for 104 hours totals $7,111.52. Factoring in 100% to account for benefits and overhead totals $14,223.04.

A GS-14 step 1 hourly rate of $58.13 per hour[8] for 104 hours totals $6,045.52. Factoring in 100% to account for benefits and overhead totals $12,091.04.

A GS-14 step 1 hourly rate of $58.13 per hour[9] for 104 hours totals $6,045.52. Factoring in 100% to account for benefits and overhead totals $12,091.04.

A GS-14 step 1 hourly rate of $58.13 per hour[10] for 104 hours totals $6,045.52. Factoring in 100% to account for benefits and overhead totals $12,091.04.

A GS-12 step 1 hourly rate of $41.37 per hour[11] for 500 hours totals $20,685.00. Factoring in 100% to account for benefits and overhead totals $41,370.00.

ACL expects the survey's contractor costs to be approximately $75,000 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. The loaded rates for the contractor staff involved with this project vary from $150/hour to $285/hour.

Table A-14-. Estimated Cost Analysis per FTE			
Grade	Hours	Rate	Total Cost

[7] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[8] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[9] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[10] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[11] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

GS 15	104	$136.76	$14,223.04
GS 14	104	$116.26	$12,091.04
GS 14	104	$116.26	$12,091.04
GS 14	104	$116.26	$12,091.04
GS 12	500	$82.74	$41,370.00
Total Fed Staff	916		$91,866.16

Total Fed staff costs	$91,866.16
Contract for database	$ 75,000
Total Cost to Federal Government	$ 166,866.16

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

There is a program change decrease of -10 annual burden hours and an adjustment decrease of -125 annual responses. The revised survey collection focuses on an annual, national survey of 1200 responses per year. The previous version of this survey required each state/territory to collect a minimum of 75 responses once every three years, resulting in an average annual response total of 1,325 responses. This change both reduces the annual survey burden while also allowing ACL to monitor overall programmatic progress on an annual basis.

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.

All 54 states and/or territories will be surveyed each year, as this is a national survey with an annual reporting period. Assuming this project has been approved and is ready to begin on August 1, 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: SMP Survey Project Time Schedule

Survey Phase	#	Task	Year 1	Year 2	Year 3
Preparation	1	**Announcement letter sent to State/Territory Directors**	8/10/2020	8/9/2021	8/8/2022
	2	**Survey training call**	8/19/2020	8/18/2021	8/17/2022
Administration Period 1	3	**Notification email to Q1 states/territories**	9/7/2020	9/6/2021	9/5/2022
	4	**Training week**	9/14/2020	9/13/2021	9/12/2022
	5	**Begin surveying events**	9/21/2020	9/20/2021	9/19/2022
Administration Period 2	6	**Notification email to Q2 states/territories**	11/30/2020	11/29/2021	11/28/2022
	7	**Training week**	12/7/2020	12/6/2021	12/5/2022
	8	**Begin surveying events**	12/14/2020	12/13/2021	12/12/2022
Administration Period 3	9	**Notification email to Q3 states/territories**	3/1/2021	2/28/2022	2/27/2023
	10	**Training week**	3/8/2021	3/7/2022	3/6/2023
	11	**Begin surveying events**	3/15/2021	3/14/2022	3/13/2023
Analysis	12	**Data Analysis Start**	5/3/2021	5/2/2022	5/1/2023
	13	**Data Analysis End**	5/14/2021	5/13/2022	5/12/2023
Reporting	14	**Report Creation Start**	5/17/2021	5/16/2022	5/15/2023
	15	**Report Creation Delivery**	6/9/2021	6/8/2022	6/7/2023
	16	**Report Briefing**	6/16/2021	6/15/2022	6/14/2023
	17	**SHIP-SMP Conference Presentation**	7/21/2020	7/20/2021	7/19/2022

Each 12-month survey period will begin with preparation and training activities and end with the submission of a national report and summary briefing to ACL Headquarters staff in June, followed by a presentation to all state/territory directors at the annual SHIP-SMP Conference (typically held in July). The report, briefing, and presentation will be used for internal program management purposes, including performance monitoring and the adoption of recommended actions.

Aside from providing each state/territory with training at the beginning of the year (Task 2), ACL will track events throughout the year to monitor state/territory progress. ACL will use a rolling administration process, collecting data during three separate Administration Periods, each of which will include 18 randomly selected states/territories. In addition to period-specific notification and training, ACL and its contractual support will be available to provide technical assistance as needed.

Blank surveys will be made available at the conclusion of pre-selected group outreach and education events, and attendees will have the ability to voluntarily complete comment card surveys with the OMB control number presented at the top of the page. Presenters will notify attendees about the opportunity to complete a survey but will not pass out the surveys to individual attendees or monitor survey progress. The presenter will leave blank surveys in a common area and ask respondents to leave their completed surveys in the same area once they are finished. These steps will be taken to maintain anonymity in the survey process. Presenters will be available to answer questions or provide assistance if requested but will not otherwise interact with the respondents while they are completing the surveys. If a potential respondent requires special assistance, such as the presenter reading the questions aloud, the presenter will be available to do so, but will not supply or suggest answers to the respondent.

All materials related to survey completion (comment cards and pencils) will be provided by the ACL presenter. After the event, ACL will scan and send the completed surveys to a third-party contractor. The contractor will collect and aggregate the survey results, which will assist with ACL’s ongoing provision of technical assistance.

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.

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.