ADMINISTRATION ON COMMUNITY LIVING

SHIP–SMP SURVEY OF ONE-ON-ONE ASSISTANCE

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 receiving assistance from the State Health Insurance Assistance Program (SHIP) or the Senior Medicare Patrol (SMP) program and (2) to report on annual performance goals

[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

as described in the Government Performance Results Act Modernization Act of 2010 (GPRAMA). 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 one on one assistance services delivered by ACL's SHIP and SMP programs. The results of the survey will be used to assess the need for 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 SHIP 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 from SHIP and his/her overall satisfaction. This result has placed an emphasis on the quality of information delivered by SHIP when providing one on one assistance to a Medicare beneficiary.

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. However, ACL will use computer-assisted telephone interviewing (CATI) software to ensure consistency in the interviews, increase the response rate, and improve the survey experience. In addition, use of ACL's existing data systems to collect consumer information such as date of initial contact, the name of the individual who conducted the one on one assistance session, and method of interaction (phone, in-person, etc.) improves potential respondent identification and reduces the length of the survey, thereby limiting the burden on individual respondents.

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 will not be able to measure satisfaction with its one on one assistance services for Medicare beneficiaries and their families and will 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 GPRAMA (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 was published in the Federal Register on December 30, 2019, vol. 84, No. 249; pp 71956-71957. There were no public comments.

In addition to conducting the survey and interacting with state representatives over the past three years, ACL collects 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.

ACL has gathered additional feedback by monitoring trends in response rates for this survey project and phone surveys generally, while also connecting with phone bank officials to understand existing challenges and possible improvements.

The primary finding from these consultations has been the importance of reducing the burden on individual states, which has led to a reduction in the total burden estimates given in this survey renewal package (see question 12 below).

A 30-Day Federal Register Notice published in the Federal Register on June 24, 2020 vol. 85, No. 122 ; pp 37949-37950.

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.

Any assurances of confidentiality are communicated to respondents prior to survey participation. This instrument does not directly collect personally identifiable information (PII) from survey respondents.

Respondent names and phone numbers are gathered from ACLs STARS system to identify and contact a representative sample of survey respondents. After these individuals have been contacted the name and phone numbers are no longer used or reported to the public. Any files that include this information are transmitted via encrypted email using two transfer points, one from ACL to the consultant group and the second from the consultant group to the administrators conducting the survey. Both ACL and CG Strategy use encryption software to email the Excel file with the use of password-protection.

Furthermore, ACL will assign respondents with a unique, but anonymous, identifier once they either complete the survey or decline to respond to it. Such anonymization will protect respondents' name and numbers when the survey is being administered.

In addition to complying with these standards, ACL will also take steps to explain to individual respondents the need for and value of this data collection, as well as the methods used to maintain confidentiality.

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 twice per year, during both the open enrollment period (October 15 – December 7) and a non-enrollment period (spring/summer). ACL expects to collect 800 responses per year, split into four separate groups to account for timing and program.

- SHIP Open Enrollment Period = 200 Responses
- SHIP Non-Open Enrollment Period = 200 Responses
- SMP Open Enrollment Period = 200 Responses
- SMP Non-Open Enrollment Period = 200 Responses

Given that over 50,000 unique assistance sessions are entered every week, it should not be difficult to collect the necessary responses given a 3-4 week administration period.

ACL will sample without replacement each period, but will aggregate data for the entire year, meaning that no individual respondent will be asked to participate more than once per year. The number of records sampled for each state or territory will be based on the state/territory's population. For example, if California's population represents 10% of the total population of the 54 states and territories, then California records would represent 10% of the total sample, with the expectation that these records would produce 10% of the completed surveys. This methodology will be used in order to obtain a representative sample.

The 800 completed surveys will form a random sample of individuals receiving one on one assistance services, with each survey response requiring six (6) minutes to complete. The target number of 800 is a result of each program generating 400 completed surveys in a single year. The survey totals were chosen as a means to:

a. Make comparisons between periods (open enrollment versus non), and
b. Produce a representative result for each program each year.

The time estimate of six (6) minutes is based on the average length of completed survey calls over the past three years. Given that the questions asked have no significant additions the six minute estimate is appropriate for calculating total burden hours.

Multiplying the 800 completed surveys per year by six minutes per survey (6/60) results in a total of 80 burden hours per year to complete this data collection.

The survey will be repeated every year for three years, providing the SHIP and SMP programs with valuable data about changes in beneficiary satisfaction with one on one assistance services.

Of the 800 surveys, all responses will come from individuals who had received one on one assistance services from a local SHIP or SMP program. Because there are no specific expectations in terms of employment status or experience, all 800 individuals will be 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 $1,998.40. This estimate is based on the per hour valuations of respondents’ time seen above and the projected 80 burden hours.

ACL will use a random sampling method to select individual cases for survey response. 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 (hrs.)	Total Burden Hours
800	1	6/60	80

The Department of Labor, Bureau of Labor Statistics, 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
80	$24.98	$1,998.40

*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:// 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 identifies no 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[4] 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[5] 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[6] for 104 hours totals $6,045.52. Factoring in 100% to account for benefits and overhead totals $12,091.04.

[4] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[5] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx
[6] https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB_h.aspx

A GS-14 step 1 hourly rate of $58.13 per hour[7] 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[8] 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
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

[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

15. Explain the reasons for any program changes or adjustments.

The revised survey collection focuses on an annual, national survey of 800 response per year. The previous version of this survey required each state/territory to collect 75 responses once every three years, resulting in an average annual response total of 1,350 responses. There is a program change of -100 annual burden hours and an adjustment decrease of -550 annual 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: One on One Assistance Survey Project Time Schedule

Survey Phase	#	Task	2020-21	2021-22	2022-23
Preparation	1	Announcement letter sent to State/Territory Directors	8/12/2020	8/11/2021	8/10/2022
	2	Survey training call 1	9/2/2020	9/1/2021	8/31/2022
	3	Survey training call 2	9/16/2020	9/15/2021	9/14/2022
	4	Pilot test sampling process	9/30/2020	9/29/2021	9/28/2022
Administration	5	Pull records (i.e., establish sample) for Round 1	10/26/2020	10/25/2021	10/24/2022
	6	Round 1 Calls Start Date	10/28/2020	10/27/2021	10/26/2022
	7	Round 1 Calls End Date	11/25/2020	11/24/2021	11/23/2022
	8	Round 1 Data Collection	11/30/2020	11/29/2021	11/28/2022
	9	Pull records (i.e., establish sample) for Round 2	4/5/2021	4/4/2022	4/3/2023
	10	Round 2 Calls Start Date	4/7/2021	4/6/2022	4/5/2023
	11	Round 2 Calls End Date	4/30/2021	4/29/2022	4/28/2023
	12	Round 2 Data Collection	5/3/2021	5/2/2022	5/1/2023
Analysis	13	Data Analysis Start	5/4/2021	5/3/2022	5/2/2023
	14	Data Analysis End	5/14/2021	5/13/2022	5/12/2023
Reporting	15	Report Creation Start	5/17/2021	5/16/2022	5/15/2023
	16	Report Creation Delivery	6/9/2021	6/8/2022	6/7/2023
	17	Report Briefing	6/16/2021	6/15/2022	6/14/2023
	18	SHIP-SMP Conference Presentation	7/21/2020	7/20/2021	7/19/2022

In each year, Tasks 1-4 would prepare the states/territories for survey administration. Next, Tasks 5-12 will focus on obtaining survey responses, Tasks 13 and 14 will involve analyzing survey response results, and Tasks 15-18 will involve reporting activities that will occur at the end of each survey year. These reporting activities include the submission of a national report and summary briefing to ACL Headquarters staff in June of each year, 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.

In order to administer the survey appropriately, states and territories will be responsible for uploading information into ACL's STARS System the week preceding the sampling pull dates (Tasks 5 and 9). Because the STARS system has been in place since 2019 and was used to sample beneficiaries on the previous version of this survey, ACL is confident that no process changes will be needed to generate a representative sample during each survey period. To account for any changes a pilot test sampling process has been established in each year (Task 4).

Additionally, state/territory employees will be expected to notify the individual receiving one on one assistance that a record of the interaction will be collected and that a third party might contact the beneficiary to assess his/her satisfaction with the assistance session.

After a week of records has been captured and uploaded to STARS, the records will be pulled on the following Monday in order to establish the sample (Tasks 5 and 9). With the sample established, calls will begin on Wednesday (Tasks 6 and 10). New samples will be pulled each Monday until the necessary number of responses has been collected (400 total, 200 for SHIP, 200 for SMP). No more than four weeks of records will be pulled in any given period.

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 during the introductory script.

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 statement.