

Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

A 60-day Federal Register Notice (FRN) published in the Federal Register on September 28, 2020, Volume 85, No. 188, page 60808. AoA also encouraged current and former PPHF grantees to respond to the Federal Register notice through a reminder sent out to grantee point of contacts. Five public comments were received and are summarized and responded to below. A 30-day FRN published on March 11, 2021 Volume 86, No. 46, pages 13904-13907.

In addition to public comment, feedback on the current forms was sought from the following internal and external stakeholders:

- National Falls Prevention Resource Center and falls prevention subject-matter experts
- A grantee focus group (with fewer than 9 participants combined)

Summary of Public Comments

In response to the Federal Registrar Notice, ACL received five emails with comments on the data collection tools.

Participant Information Form and Post Survey

<u>Comment</u>	<u>Response</u>
A suggestion was made to add a purpose statement to the forms to better inform participants of why this specific data collection is pertinent.	ACL did not adopt this suggestion. The purpose of this data collection is multi-fold – with different benefits and potential uses of the data by federal, state, and local stakeholders.
Suggestions were made to make adjustments to the wording and/or response options for some of the demographic questions, such as those related to race, ethnicity, and gender.	ACL did not adopt these suggestions. The wording and response options for the demographic questions included are consistent with OMB-approved surveys for other ACL programs. Having this consistency allows ACL and researchers utilizing this data to compare outcomes from the population reached with ACL's Falls Prevention Programs to a more

	broadly representative population of older adults.
For some of the non-demographic questions, suggestions were made to use different response options, adjust the wording of the questions, or use different measurement scales.	ACL did not adopt these suggestions. ACL consulted with experts in the field to identify validated scales to capture the information needed to understand the impact of the programs on critical domains. Adjusting the wording of the questions would impact their validity.
<p>Several suggestions were made with respect to the formatting of the forms.</p> <ol style="list-style-type: none"> 1. Provide a small box on the bottom right hand corner of each sheet to identify participant ID. Should paperwork be separated, it provides another mechanism to keep forms complete. Also suggest adding more white space to the document, increasing the space between questions and answers, and increasing the font size. 2. There needs to be further consistency with bullet point sizes and format of questions. They seem to be inconsistent. 3. To better align the pre- and post- survey, it might make sense to move question number 9 on Participant Information Form closer to question 12. 4. In question 7, the word “agree,” is misspelled under “Strongly disagree.” 	<ol style="list-style-type: none"> 1. ACL did not adopt these suggestions in order to keep the Participant Information Form and Post-Survey to one sheet (front and back). ACL will be providing the surveys to grantees in a Word format so they can make any formatting edits they deem necessary, i.e., larger font size, more white space, etc. 2. ACL reviewed the bullet point sizes and format of questions to ensure consistency. 3. ACL revisited the ordering of the forms to ensure the questions align, to the greatest extent possible. 4. ACL made the spelling correction to question 7.
Some commenters suggested including definitions of certain terms on the form, for example, defining what is meant by “vigorous” or “moderate” exercise.	ACL did not adopt suggestions to provide detailed definition of terms within the questions. Including definitions would increase the length of the forms, resulting in greater participant burden. Local program coordinators are available to assist participants completing the forms,

	in the event any questions arise with any of the specific questions.
A suggestion was made to remove the proposed Question 19 from the Participant Information Form, with the comment that it is not relevant pre-program.	ACL adopted this suggestion.
A suggestion was made to adjust the wording of the existing Question 11 (and the response options) to align with the ACL Chronic Disease Self-Management Education data collection forms.	ACL did not adopt this suggestion. The ACL Falls Prevention and Chronic Disease Self-Management Education grant programs are two distinct grant programs, with two distinct lists of chronic conditions in their OMB-approved data collections.
<p>A suggestion was made to expand the following question on the Participant Information Form:</p> <p>“Are you limited in any way in any activities because of physical, mental, or emotional problems?”</p> <p>Suggested replacement questions:</p> <ul style="list-style-type: none"> • “Because of a physical, mental, or emotional condition, do you: <ul style="list-style-type: none"> ○ Have serious difficulty concentrating, remembering, or making decisions? Yes, No ○ Have difficulty doing errands alone such as visiting a doctor’s office or shopping? Yes, No” • “Do you have serious difficulty walking or climbing stairs? Yes, No” • “Do you have difficulty dressing or bathing? Yes, No” 	ACL did not adopt this suggestion. This question was only included in the Participant Information Form, not the Post Survey. The Participant Information Form and Post Survey already include questions to assess limitations due to physical, mental, and/or emotional problems, so this question was deemed duplicative and removed from the Participant Information Form entirely to reduce participant burden.
A commenter suggested adding the following questions to the forms:	ACL did not adopt these suggestions to avoid increasing participant burden and the length of the forms beyond one sheet (front and back).

<ul style="list-style-type: none"> • “Are you deaf or do you have serious difficulty hearing? Yes, No” • “Are you blind or do you have serious difficulty seeing, even when wearing glasses? Yes, No” • “During the past year, did you provide regular care or assistance to a friend or family member who has a long-term health condition or disability?” 	
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Fall Prevention Coversheet

<u>Comment</u>	<u>Response</u>
<p>Some commenters suggested not requiring a separate Program Information Coversheet – instead folding some of the questions in the coversheet into the Participant Information Form, Post-Survey, and/or the semi-annual grantee report.</p>	<p>ACL did not adopt this suggestion. The grantee focus group reported that this form was useful for organizing their data collection and program delivery. Adding questions to the Participant Information and Post-Survey would also increase their length beyond 1 sheet (front and back).</p>
<p>A commenter provided the following formatting-related comments:</p> <ul style="list-style-type: none"> • The dotted lines dictating the start year appear to be missing – suggest adding these; and • suggest adjusting the bullet sizes to be consistent, specifically in question number 7, the bullet under indicating “other,” is different from the previous bullet 	<p>ACL adopted these edits.</p>
<p>A commenter suggested adding a space to note host/implementation organization.</p>	<p>ACL did not adopt this suggestion.</p>
<p>A commenter suggested adding check boxes to note if the program was delivered in a remote format.</p>	<p>ACL did not adopt this suggestion due to variability in how remote programs are defined and delivery format.</p>

Host/ Implementation Organization Form

<u>Comment</u>	<u>Response</u>
A commenter suggested adding to Question 2 the statement, "Please check only if you are a new _____ Host Organization _____ Implementation Site."	ACL did not adopt this suggestion. The purpose of this form is to document new host organizations and implementation sites, so these additional instructions were deemed unnecessary.

Fall Prevention Attendance Log

<u>Comment</u>	<u>Response</u>
One commenter suggested using an "X" (rather than fill in the box) to denote sessions attended.	ACL adopted this suggestion.
One commenter noted that "the last blank for 'end date' is not bolded".	ACL made this correction.
One commenter suggested changing the form to landscape to account for length of Tai Chi and Enhance Fitness programs.	ACL adopted this suggestion.

Comment relevant to all forms:

<u>Comment</u>	<u>Response</u>
One commenter suggested that ACL provide fillable PDF forms.	ACL will be providing the documents in Word format. If resources allow, we will also provide fillable PDFs for grantee use.