SUPPORTING STATEMENT A

APPLICATION FOR TRAINING

OMB Control No. 0920-0017

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- **Goals:** To continually improve CDC training activities that offer continuing education and maintain CDC compliance with mandatory accreditation organization standards by efficiently collecting information through CDC's Training and Continuing Education Online (TCEO) system.

- **Intended Use:** CDC will use information collected by TCEO to generate certificates of attendance and verify training completion, review and approve proposals for educational activities to receive continuing education accreditation, evaluate and improve courses based on learner feedback, and ensure compliance with mandatory accreditation standards.

- **Methods to be used to collect:** Online, using a secure electronic web-based password and firewall protected platform.

- **Subpopulation:** Public health and healthcare professionals.

- **How data will be analyzed:** No statistical methods are used to analyze the information collected. CDC tracks participant training activities by using the identifiable information that facilitates the retrieval of historical information and creates aggregate reports on attendance and educational activities submitted for accreditation.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

This Information Collection Request (ICR) is for the revision of a currently approved OMB information collection. Approval is requested for 3 years. The current OMB approval (0920-0017) expires June 30, 2019. This collection of information and data from health professionals is authorized by the Public Health Service Act, Title 42, The Public Health and Welfare, Chapter 6A-Public Health Service, 1) Subchapter V-Health Professions Education, Part E-Health Professions and Public Health Workforce, subpart 2-public health workforce Section 295 (Attachment 1A); 2) Subchapter V-Health Professions Education, Part F-General Provisions, Health Professions Data Section 295k (Attachment 1B); and by Title 42, Subchapter II, General Powers and Duties, Part B, Federal-State Cooperation, Section 243 (Attachment 1C).

CDC is accredited by multiple accreditation organizations to award continuing education (CE) for public health and health professionals (learners). CDC's Center for Surveillance, Epidemiology, and Laboratory Services (CSELS) coordinates CDC's CE activities. By offering free, accredited educational activities and CE, CDC saved the U.S. workforce more than $3 million in training costs to public health and health professionals in FY2017. To comply with the mandatory requirements of accreditation organization standards, CDC requires health professionals seeking CE to use the Training and Continuing Education Online (TCEO) system. CDC uses the TCEO system to manage the accreditation process for educational activities developed by CDC and CDC-funded partners (educational developers). Aggregate data from the system will be used to improve educational activities and provide reports to the accrediting organizations.

Requested revisions are (1) to add questions to the existing TCEO New Participant Registration, (2) introduce a TCEO Post-Course Evaluation and, (3) introduce a TCEO Follow-up Evaluation. The changes are outlined below:

1. Implement additional questions (to ask for State/Territory and Phone number, and more specific drop-down choices for existing questions) to the TCEO New Participant Registration form (Attachment 4). CDC awards CE to physicians, nurses, health education specialists, pharmacists, veterinarians, and public health practitioners for free who register for accredited trainings to maintain their professional licensures and certifications. The information collected by the TCEO New Participant Registration is entered into tracking databases and used to authenticate learners when they sign up for an educational activity, generate certificates of attendance and continuing education as proof of participants' attendance, aggregate reports, and produce transcripts when requested. Continued use of the TCEO New Participant Registration allows CDC to comply with mandatory accrediting organizations' standards, coordinate learner registrations, manage and offer accredited educational activities, aggregate responses to evaluation tools for CDC to implement improvements to educational activities as needed, and provide required reports to the accrediting organizations on an annual basis.

2. Establish a new TCEO Post-Course Evaluation consisting of 21 questions to be taken immediately after training (Attachment 5). Registered learners will not be able to receive CE unless they complete the required TCEO Post-Course Evaluation.

3. Establish a new TCEO Follow-up Course Evaluation consisting of seven questions (Attachment 6). Registered learners will receive a reminder and a link generated by the TCEO system to the TCEO Follow-up Course Evaluation approximately 6-weeks after participating in an educational activity.

The revision includes additional questions added to the approved TCEO New Participant Registration (Attachment 4). This electronic tool collects the required information needed to process new learners' registration to participate in free accredited educational activities including e-learning, classroom study, and conferences. CDC uses the data collected from the TCEO New Participant Registration to ensure learners who have earned CE receive the free CE they earned to maintain their professional licensures and certifications. In addition, aggregate data from the New Participant Registration tool is used to provide required reports to the accrediting organizations on an annual basis. The data collected about an educational activity helps the accreditation team determine if CE can be offered for that particular educational activity. The four, paperless information collection tools provide CDC with the information necessary to accredit educational activities, ensure users receive earned CE, improve educational activities, and effectively manage educational activities pertinent to its mission to strengthen the skills of the current workforce through quality, accredited, and competency-based training.

CDC is accredited by the following seven accrediting organizations: (1) Accreditation Council for Continuing Medical Education, (2) International Association for Continuing Education and Training, (3) National Commission for Health Education Credentialing, (4) National Board of Public Health Examiners, (5) American Nurses Credentialing Center's Commission on Accreditation, (6) Accreditation Council for Pharmacy Education, (7) the American Association of Veterinary State Boards/Registry of Approved Continuing Education. The accrediting organizations have specific requirements for tracking participants' educational activities, required evaluation questions, and identifiable information to facilitate retrieval of historical information for a period of seven years after course completion.

Without the use of this information collection, CDC would face the following negative consequences: CDC would be unable to award accreditation for educational activities; learners would be unable to register for free accredited educational activities offered by CDC or earn free CE to maintain their professional licensures and certifications; and CDC would be unable to evaluate and improve the quality of its educational activities, or to plan and manage trainings. Opportunities for obtaining CE and professional competence of health professionals would decline in the United States, thus negatively impacting both domestic and international public health.

2. Purpose and Use of Information Collection

The TCEO applications provide CDC with an efficient, effective, and secure electronic mechanism for collecting and processing information required by accrediting organizations for collecting and reviewing educational activities to ensure they meet accreditation standards.

The approved TCEO Proposal (Attachment 3) expedites the process for ensuring educational activities meet accrediting organizations standards and allows CDC to offer more accredited educational activities to meet the increasing demand of the public health and healthcare workforce (learners). CDC and its funded partner organizations (educational developers) develop educational activities for learners to meet their professional development needs. Implementation of the TCEO Proposal through the TCEO system enhances collaboration among CDC and its partner organizations and expedites CDC's review during the accreditation process. The TCEO Proposal

provides an efficient mechanism to aggregate data for assessment and reporting. After CDC accredits an educational activity, registered learners can access and take the activity to earn CE. No changes were made to the TCEO Proposal since it was last approved.

To ensure learners receive the CE they have earned, and the opportunity to evaluate educational activities, TCEO optimizes CDC's ability to build and sustain public health and healthcare capacity, help save lives, and protect people from health threats in the U.S. and worldwide.

A 3-year revision of the approved Application for Training will allow CDC to continue use of the electronic, standardized TCEO Proposal and the TCEO New Participant Registration. TCEO has reduced the burden of manual, paper-based processes and improved the convenience and efficiency for educational developers to achieve CE accreditation, providing more accredited educational activities for learners. Learners, after their initial registration, use the same login and password to take as many courses as needed to receive free CE through TCEO. The addition of the two new electronic evaluation tools will provide information for improving educational activities as needed and will allow CDC to comply with mandatory accrediting organizations' standards.

3. Use of Improved Information Technology and Burden Reduction

The four TCEO system tools provide an efficient and integrated electronic mechanism that meets accreditation requirements and promotes use of secure data and information system standards to improve timeliness, accuracy, completeness, and consistency of data collection. Data are collected electronically for 100% of the TCEO information collection tools. The TCEO system meets mandatory accrediting organizations' standards for accreditation, continuing education, and evaluation. Educational developers submit a standardized electronic application through the TCEO Proposal. The data collected about the educational activity helps the accreditation team determine if CE can be offered for that particular educational activity.

Learners register once and can participate in as many educational activities as needed to earn CE using the same login and password. Learners evaluate the courses and educational products they take to provide information to improve courses to make them more relevant and engaging. The TCEO Post-Course Evaluation is required to receive the CE they earned. Both the Post-Course and Follow-up Evaluation tools are required by the accrediting organizations.

TCEO assures 100% compliance with the Government Paperwork Elimination Act (GPEA), Public Law 105-277, title XVII, 1998, lowering the burden to the respondent, allowing persons to submit information electronically, and providing capabilities for CDC to maintain records electronically.

4. Efforts to Identify Duplication and Use of Similar Information

Information collected through TCEO is for CDC accreditation for the seven accrediting organizations and completion of the related accredited courses and is not available from any other source. There are no duplications of these data.

5. Impact on Small Businesses or Other Small Entities

No small businesses have been, are, or will be involved in TCEO data collection.

6. Consequences of Collecting the Information Less Frequently

The timeliness of data collection using the TCEO system is crucial. Data are collected once per educational activity submitted for accreditation in the TCEO Proposal (Attachment 3), once at registration in the TCEO New Participant Registration (Attachment 4), once at completion of the new TCEO Post-Course Evaluation (Attachment 5) for each educational activity completed, and once at the TCEO Follow-up Evaluation (Attachment 6) for each educational activity completed. We estimate that registered learners will participate in two educational activities per year; therefore, each learner will take the TCEO Post Course Evaluation twice per year to earn CE. We estimate that approximately 10% of learners will take the TCEO Follow-up evaluation. All components of TCEO are required by the accreditation organizations to ensure compliance with accreditation standards, and the timeliness of providing reports to accrediting organizations is necessary for CDC to maintain accreditation. If CDC was not able to collect these data in a timely manner or was unable to collect these data, CDC's ability to meet its mission to strengthen the skills of the current workforce through quality, accredited, competency-based training would be compromised. The timeliness of data collected through the TCEO Proposal is essential and results in timely award of accreditation for an educational activity submitted for accreditation. Without timeliness of accreditation, learners would not have the opportunity to take the educational activities they need to earn free CE, and they risk losing professional licensures and certifications. The timeliness of data collected by the TCEO New Participant Registration (Attachment 4) is crucial for a registrant to earn the free CE required to maintain professional licensures and certifications. The timeliness of data collected from TCEO Post-Course Evaluation will result in timely award of earned CE; health professionals will not receive CE until after they complete the TCEO Post-Course Evaluation (Attachment 5). The timeliness of data collected from the TCEO Follow-up Evaluation (Attachment 6) will result in timely improvements to educational activities taken by learners to improve their knowledge and skills and earn CE.

7. Special Circumstances Relating to the Guidelines of CFR 1320.5

This request fully complies with the regulation 5 CFR 1320.5.

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

A. The agency's first notice of proposed revision to the existing data collection was published in the Federal Register on December 10, 2018 (Vol 83, No. 236, pp 63513-63515) (See Attachment 2. Published 60-day FRN). CDC did not receive comments in response to this notice.

B. No formal consultations outside the agency have been held.

9. **Explanation of Any Payment or Gift to Respondents**

There are no payments, incentives, or gifts provided to respondents.

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

The CSELS' Information Systems Security Officer reviewed the information collection and determined that the Privacy Act does apply based on the collection of information in identifiable form (IIF). Information in identifiable form data collection includes only the minimum elements to satisfy requirements for continuing education applications and continuing education course proposals.

Personally identifiable information (PII) collected on the TCEO Proposal (Attachment 3) includes the educational developer's name, telephone number(s), email address, and organization. In addition, CDC collects biographical data for course instructors, including instructors' names, professions, telephone numbers, addresses, email addresses, and organizations. CDC uses this information for managing reviews, corresponding with the educational developer, and ensuring course instructors have the appropriate qualifications to teach course content as required by accrediting organizations, all of which ensures national accreditation standards are met before accrediting the CE activity.

PII collected by the TCEO Proposal (Attachment 3) is filed and retrieved by the name of the person, and is not published. An advisement or consent notice is provided for all educational developers and is clearly displayed immediately above the Public Burden Statement section of the TCEO Proposal on the login page. The statement is, "The Privacy Act applies to this information collection. The requested information is used to process your request for educational activities to receive accreditation. CDC will treat data/information in a secure manner and will not disclose, unless otherwise compelled by law or upon your written request. Accreditation can only be conferred when all requested information is submitted."

PII collected on the TCEO New Participant Registration (Attachment 4) includes learners' name, mailing address, phone numbers, and email address. Accreditation organizations require identifiable information for tracking attendance in the course offerings, authenticating the individual learners who receive CE, and managing transcripts for learners. An advisement/consent notice is provided for all TCEO new participation registrants and is clearly displayed immediately above the Public Burden Statement section of the TCEO New Participant Registration on the login page. The statement is, "The Privacy Act applies to this information collection. The requested information is used only to process your training registration. CDC will treat data/information in a secure manner and will not disclose unless otherwise compelled by law or upon your written request. Continuing education credit, contact hours, or units can only be provided when all requested information is submitted."

The following question and answer is included in the frequently asked questions (FAQ) section on the TCEO website.

Question: How is my information protected?

Answer: This is a secure website on a CDC web server that uses encryption to protect the information that you provide. Information in your individual Training and Continuing Education Online (TCEO) account is accessible to you and CDC for reporting purposes and to provide assistance. Some account information is accessible by the TCEO Learner Support team to help you access your account or use the system. For reporting purposes, TCEO data are shared with accrediting organizations as required and course data (information about the group of people who took a course) may be summarized and shared with course providers for evaluation and program improvement purposes.

To ensure your account information remains protected, we recommend that when you are done using TCEO, select the Sign Out button in the top right corner of the website. For additional security, after 15 minutes with no activity on a TCEO webpage, you will receive a pop-up warning. After 20 minutes of no activity on a TCEO page, you will automatically be signed out to prevent anyone from accessing your information.

No PII is collected by the TCEO Post-Course Evaluation (Attachment 5) or the TCEO Follow-up Evaluation (Attachment 6). The PII associated with the learner's New Participant Registration is encrypted.

Personal information is maintained for at least seven years. CDC will retain and destroy records in accordance with the applicable CDC Records Control Schedule.

TCEO allows CDC TCEO staff to use the information collected through password and firewall protections to efficiently process and review educational developers' submissions to ensure national accreditation standards are met before accrediting educational activities. CDC's TCEO staff use the information collected through password and firewall protections to efficiently process new participants' registrations and post-course evaluations to ensure learners receive the CE they earned to maintain professional licensures and certifications, generate certificates of attendance and CE as verification of training activity attendance, produce participant transcripts when requested, improve educational activities as needed, and produce reports for the accrediting organizations on an annual basis. CDC's TCEO staff use the information collected through password and firewall protections to efficiently process follow-up course evaluations to improve educational activities as needed and to produce reports for the accrediting organizations on an annual basis.

This submission has been reviewed by staff in the CDC ICRO who determined that the Privacy Act does apply. The applicable System of Records Notice (SORN) is 09-20-0161, "Records of Health Professionals in Disease Prevention and Control Training Programs, HHS/CDC/NCPS" (Attachment 7. Privacy Act Issuances 09-20-0161). Safeguards have been established to minimize the possibility of unauthorized access to the information being collected through the TCEO system. Technical controls include password protection and storing all personal identifiable information on a Microsoft SQL server, configured behind the CDC firewall. Physical controls include the use of a secure data center, which requires identification badges and authorized key cards for entry. Security provisions meet all requirements established by CDC's Health Information System and Surveillance Board. Administrative controls restrict access to the SQL database, ensuring accessibility only through the TCEO application, for CDC/CSELS administrative personnel and IT staff. Although contractors at CDC maintain the TCEO system, or support the collection and

administration of learner data and CE proposals, CDC owns the information collections. Data are not sold, rented, or shared with third parties for promotional use or otherwise. Data are and will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law.

Other administrative controls include the system's security plan, which defines the process for handling security incidents. The system's team and the Office of the Chief Information Security Officer (OCISO) share the responsibilities for event monitoring and incident response. Suspicious security or adverse privacy related events are directly reported to the component's Information Systems Security Officer, CDC helpdesk, or to the CDC Incident Response Team. The CDC OCISO reports to the HHS Secure One Communications Center, which reports incidents to US-CERT as appropriate.

11. Justification for Sensitive Questions

No questions of a sensitive nature are asked of respondents. Approval by the CDC Institutional Review Board (IRB) is not required for this information collection system. This data collection is not considered human subject research. This conclusion is based on the description and justification for TCEO and on the definition research, as defined by the federal policy for the protection of human subjects (45 CFR 46) (Attachment 8. Research Determination Memorandum).

12. Estimates of Annualized Burden Hours and Costs

Pilot tests with fewer than 9 respondents from the target population were conducted to improve usability because minor changes were made to the TCEO New Participant Registration. Response times have not changed. Pilot tests with fewer than 9 respondents from the target population were conducted for both the new TCEO Post-Course Evaluation and the new TCEO Follow-up Evaluation to ensure usability and determine response times for the burden tables.

The respondent types included in the burden estimates for this ICR are educational developers and learners. Annualized burden hours and costs presented include only the burden of respondents who are not federal employees or entities.

The calculated annualized burden hours and burden costs for each TCEO data collection tool takes into consideration the variances for each data collection tool and an adjustment for increased cost of living in respondents' estimated salaries.

A. Estimated Annualized Burden Hours

The TCEO Proposal (Attachment 3) reflects an average of 5 hours to complete the tool and 120 educational developers (health educators) are expected to complete the TCEO Proposal. The TCEO New Participant Registration (Attachment 4) reflects an average 5 minutes to complete the tool. The new TCEO Post-Course Evaluation (Attachment 5) reflects an average of 10 minutes, to complete the tool and 200,000 respondents, each responding twice per year. The new TCEO Follow-up Evaluation (Attachment 6) reflects an average of 3 minutes, to complete the tool and 20,000 respondents (approximately 10% of those taking the Post-Course Evaluation), each responding twice per year.

The respondent types for the TCEO proposal are Educational Developers (health educators). Public

health and health care professionals (learners) seeking CE use the TCEO new participant registration, the TCEO Post-Course Evaluation, and the TCEO Follow-up evaluation tools. The total estimated annualized burden hours for public health and health care professionals is 85,334.

Each accredited educational activity taken by registered learners has an associated new TCEO Post-Course Evaluation and an associated new TCEO Follow-up Evaluation. These two new tools resulted in the estimated increase of respondents and burden from 2016.

Following is a table showing the average total response burden hours for the four TCEO system tools by respondent type.

Estimated Annualized Burden Hours

Type of Respondents	Tool	Number. of Respondents	Frequency of Response	Average Burden Time per Response (in hours)	Average Total Response Burden (in hours)
Educational Developers (Health Educators)	TCEO Proposal	120	1	5	600
Public Health and Health Care Professionals (Learners)	TCEO New Participant Registration	200,000	1	5/60	16,667
Public Health and Health Care Professionals (Learners)	TCEO Post-Course Evaluation	200,000	2	10/60	66,667
Public Health and Health Care Professionals (Learners)	TCEO Follow-up Evaluation	20,000	2	3/60	2,000
Total		0			0

B. **Estimated Annualized Cost to Respondents**:

There is no cost to respondents other than their time to complete the data collection. The following sources were used to determine the average salaries of the TCEO learners:

- US Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics Program, CareerOneStop

The annualized cost burden to nonfederal educational developers submitting courses through the TCEO Proposal and for nonfederal learners registering through the TCEO New Participant Registration has not significantly increased since 2016. However, the addition of the new TCEO Post-Course Evaluation tool and the new TCEO Follow-up Evaluation tool has significantly increased the annualized cost burden to nonfederal public health and healthcare professionals.

Estimated Annualized Burden Costs

Type of Respondents	Tool	Number of Respondents	Frequency of Response	Average Burden per Response (in hours)	Hourly Wage Rate	Total Respondent Costs
Educational Developers (Health Educators)	TCEO Proposal	120	1	5	25.51	$15,306.00
Public Health and Health Care Professionals (Learners)	TCEO New Participant Registration	200,000	1	5/60	$46.30	$771,666.67
Public Health and Health Care Professionals (Learners)	TCEO Post-Course Evaluation	200,000	2	10/60	$46.30	$3,086,666.67
Public Health and Health Care Professionals (Learners)	TCEO Follow-up Evaluation	20,000	2	3/60	$46.30	$92,600.00
		420,120				0

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no capital or maintenance costs to respondents or record keepers.

14. Annualized Cost to the Government

Capital and start-up costs for building the new Post-Course Evaluation are estimated at $27,600, and capital and start-up costs for building the new Follow-up Evaluation are estimated at $36,800. This amount includes one non-full-time equivalent software engineer at 65% of time and costs for required computer equipment, for the first year following OMB approval.

The estimated annualized costs to operate and maintain the system are $834,164.00. No additional development costs are anticipated for TCEO over the next 3-years.

Estimated Annualized Operations and Maintenance Costs

Item	Cost Categories	Annualized Cost to Federal Government
Operations & Maintenance (O&M) Cost	Project Management	$38,160
	Program Staff*	$133,000
	System Maintenance and IT Support*	$663,000
Total O&M Cost		0

*Contractor Costs

15. Explanation for Program Changes or Adjustments

This ICR requests a revision to the Application for Training, OMB No. 0920-0017, with additional questions added to the TCEO New Participant Registration and the addition of two new evaluation tools: the TCEO Post-Course Evaluation and the TCEO Follow-up Evaluation. This will allow CDC to comply with accrediting organizations' mandatory standards. Addition of the two new evaluation tools will also provide CDC with information for improving educational activities that are offered for accreditation, resulting in a more highly skilled public health and healthcare workforce. The two new evaluation tools are required by the accrediting organizations to ensure compliance with mandatory accreditation standards. These changes result in a burden increase of 68,667 hours.

The respondent types and burden hours included for each data collection included in this ICR are nonfederal CDC partner funded organizations' educational developers and nonfederal public health and healthcare professionals (learners).

16. Plans for Tabulation and Publication and Project Time Schedule

 Internal reports will be generated using available TCEO data elements to provide trends and program data for DSEPD leadership and the accrediting organizations. TCEO staff collect the information and compile them in program reports documenting accreditation progress, continuing education processes, and performance. Only aggregate data are reported. Reports to accrediting bodies occur once a year for some and monthly for others. Reports to developers for aggregate data on their courses and evaluation data to inform course improvement occurs quarterly. Programmatic data from TCEO reports include trends and program data, such as the number of educational activities submitted by educational developers to receive accreditation, number of learners seeking

continuing education who register using the TCEO New Participant Registration and take the TCEO Post-Course Evaluation, and number of learners who earned continuing education who take the TCEO Follow-up Evaluation.

Timeline of Key Events Following Receipt of OMB Clearance for Revision Request

Activity	Time Schedule
Training and Continuing Education Online (TCEO) Proposal	Following receipt of OMB clearance, CDC will continue collecting data throughout the approval period.
TCEO New Participant Registration	Following receipt of OMB clearance, CDC will continue collecting data throughout the approval period.
TCEO Post-Course Evaluation	Following receipt of OMB clearance, CDC will begin collecting data throughout the approval period.
TCEO Follow-up Evaluation	Following receipt of OMB clearance, CDC will begin collecting data throughout the approval period.

17. Reasons Display of OMB Expiration Date is Inappropriate

CDC is not requesting an exemption from displaying the expiration date.

18. Exceptions to the Certification for Paperwork Reduction Act Submissions
No exceptions to certification apply to this request.

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