

**Request for OMB Review and Approval
Under the Paperwork Reduction Act and 5 CFR 1320**

OS Think Cultural Health

**Request for Revision of a Previously Approved Collection:
Control No: 0990-0407, Expiration 6/30/2022**

Supporting Statement A

March 30, 2022

Submitted by:

U.S. Department of Health and Human Services
Office of Minority Health
1101 Wootton Pkwy, Suite 100
Rockville, MD 20852

Supporting Statement for OS Think Cultural Health

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Office of Minority Health (OMH), Office of the Secretary (OS), Department of Health and Human Services (HHS) is requesting approval from the Office of Management and Budget (OMB) on revision for respondent registration and course/unit evaluation questions for the suite of e-learning programs and e-resources housed on the Think Cultural Health (TCH) website.

The TCH website is an initiative of the HHS OMH's Center for Linguistic and Cultural Competence in Health Care (CLCCHC), with the goal of advancing health equity at every point of contact. The TCH website was created in recognition of the effectiveness of online distance learning and is a repository of resources and tools to promote cultural and linguistic competency in health care. Its features include: a library of cultural competency resources; an interactive map tracking state activities related to cultural and linguistic competency; an e-resource on the provision of communication and language assistance services in health care organizations; and a suite of accredited e-learning programs in cultural and linguistic competency designed for health and health care professionals such as physicians, nurses, oral health providers, and disaster preparedness personnel, available at no cost to respondents. The TCH website is unlike other government websites in that its suite of e-learning programs affords health and health care professionals the ability to earn continuing education credits through training in cultural and linguistic competency.

The TCH website supports HHS OMH in complying with the cultural competency requirements of the Patient Protection and Affordable Care Act of 2010 (ACA) (P.L.111-148) (**Attachment A**), as well as the HHS Strategic Plan, Healthy People 2030, and the Secretary's priority on health equity.

The ICR is for revision of the approved information collection assigned OMB control number 0990-0407 scheduled to expire on June 30, 2022. The revision to this ICR includes revisions to the online website registration form to streamline and change response options for some elements.

2. Purpose and Use of Information Collection

All information will be collected directly from respondents who wish to register to receive access to e-resources and/or e-learning programs offered on the site, via completing an online website registration form (**Attachment B**). To create a respondent user account, individual-level information is collected via the registration form, which includes the registrant's email address/username, country, zip code, sex, ethnicity, race, primary language, place of employment, level of seniority, professional role, and how the user heard about TCH. Collection of this type of individual-level information is needed to verify that the website is used by a variety of health professionals, representing various demographic characteristics, as required for HHS/OS/OMH to comply with the cultural competency requirements of the ACA. For those individuals registering for one of the e-learning programs, the registration questions also ask for the user's first and last name, relevant license/membership numbers, degree, and type of certificate the individual would like to receive upon completion, to generate certificates of continuing education credit/statements of participation and for accreditation purposes. Course/unit evaluation information will also be collected directly from those registered users who have completed a course/unit of an e-learning program and/or an e-resource, via the administration of online questions specific to the resource or e-learning program course/unit completed (**Attachment C**).

In addition, to ensure that the e-learning programs and e-resources offered on the TCH website are relevant, useful, and appropriate to their target audiences, a more comprehensive quality improvement approach is needed to obtain user feedback. This quality improvement approach includes three types of data collection: follow-up survey, focus groups, and key informant interviews.

For follow-up surveys, information will be collected directly from registered respondents who have completed a course/unit of an e-learning program and/or an e-resource, via administration of an electronically transmitted follow-up survey (**Attachment D**). Individual-level information collected by the follow-up survey includes how the respondent has used the information learned from the e-learning program or e-resource in his/her daily work and suggestions for improvement.

Focus groups and key informant interviews will be conducted to pilot test and field test draft content with respondents who are representative of the target audience, and to obtain in-depth feedback about the e-learning program and/or e-resources on the TCH website. For focus groups and key informant interviews, information will be collected in person and via phone, respectively. Focus group data will be collected using a moderator's guide protocol (**Attachment E**), and key informant data will be collected using an interview protocol (**Attachment F**). While questions will remain the same across focus groups and key informant interviews, there will be some variability in the wording of questions to obtain feedback specific to a particular e-

learning program or e-resource.

The information collected from potential focus group and key informant interview respondents pertains to a smaller subset of respondents who have consented to provide in-depth feedback about the e-learning programs and/or e-resources available on the TCH website. Individual-level information collected includes first name, last initial, sex, race, ethnicity, work setting, professional title, and other information relevant to the purpose of the focus group (e.g., demographic characteristics of patients served). Please see the appendices for the data collection instruments for focus groups and key informant interviews.

The collection of registration information, course/unit evaluation, and follow-up surveys will occur via questions administered online. Each respondent is a single registrant/user of the TCH e-learning program(s) and/or e-resource(s). There are no requirements for annual responses. A single respondent completes the registration process to access an e-learning program or e-resource on the website only one time and completes course-specific questions for each e-learning program course/unit or e-resource per completion. A respondent may be invited to participate in the follow-up survey, a focus group, or a key informant interview. Respondents electing to be contacted for follow-up will not be asked to participate in more than one follow-up activity (i.e., survey, focus group, or key informant interview). There are no requirements for annual responses.

The information generated from these data collection efforts will have multiple applications. The respondent registration questions will be used by HHS OMH to understand trends in registration for TCH's various offerings, to inform targeted marketing efforts, to inform the development of future e-learning programs and resources, and to generate certificates of credit/statement of participation for respondents of e-learning programs. The course/unit evaluation questions will be used by HHS OMH to assist in improving existing resources provided on the TCH website. Follow-up survey, focus group, and key informant interview data will be used to inform the development of new e-learning programs and e-resources; to inform the maintenance and improvement of current e-learning programs and e-resources on the TCH website; and to understand trends and outcomes of content utilization (i.e., who, how, and where e-learning program and e-resources are being implemented).

3. Use of Improved Information Technology and Burden Reduction

The use of online registration and course/unit evaluation questions for e-learning programs and resources on the TCH website reduces the burden on website respondents for acquiring necessary, current, and updated information from disparate locations. The online format also allows respondents to register, login, and receive

information that would otherwise have to be retrieved through other more burdensome means such as standard mail, telephone, or facsimile. In turn, respondents have immediate access to information upon completion of the registration form that is designed to collect all necessary information while minimizing respondent burden. The use of electronic course/unit evaluation questions allows respondents who have accessed an e-resource or completed an e-learning program course/unit to provide instant feedback that would otherwise have to be retrieved through other more burdensome means such as standard mail, telephone, or facsimile.

The follow-up approaches vary in their use of technology but are all meant to minimize respondent burden. The follow-up survey, administered in an online format, allows registered respondents the ability to provide feedback that would otherwise have to be retrieved through other more burdensome means such as standard mail, telephone, or facsimile. While focus groups and key informant interviews may be regarded as more burdensome than other data collection methods (such as electronic surveys), they achieve feedback that is more rich, nuanced, and in-depth. This caliber of results is necessary to appropriately understand and respond to the target audience's assessment of strengths and weaknesses of the e-learning programs and e-resources under review. Participation in any of the follow-up data collection methods is completely voluntary and will occur once per respondent, and respondents will be notified of the time commitment during the informed consent process. In accordance with industry standards, focus group participants will receive remuneration appropriate for their time.

4. Efforts to Identify Duplication and Use of Similar Information

Based on the nature of the TCH website, the registration form requires the collection of specific information, such as the registrant's email address/username, country, zip code, sex, ethnicity, race, primary language, place of employment, level of seniority, professional role, permission to receive information about other resources, and how the user heard about TCH to allow for the creation of respondent accounts. Collection of this type of information has been used for websites and services to verify that the site is used by a variety of health and health care professionals representing different genders, races, skills, and demographic locations, as required for HHS OMH to comply with the cultural competency requirements of the ACA. For the e-learning programs, the registration questions also collect the respondent's first and last name, street address, relevant license/membership numbers, degree, and certificate type in order to generate certificates of continuing education credit/statements of participation and for accreditation purposes. There is no existing repository of this information that can be leveraged to complete the forms on behalf of the registrants of the TCH website.

The information being collected by the course/unit evaluation questions pertains to the individuals who have elected to complete a course/unit of an e-learning program or an e-resource. As the information collected through the follow-up surveys, focus groups, and key informant interviews is specific to an e-resource or a particular unit of an e-learning program on the TCH website, there is no existing repository of this information that can be leveraged to satisfy or supersede the need for engaging with registered program respondents.

5. Impact on Small Businesses or Other Small Entities

While the TCH website features are open and available to the public, the majority of respondents are in the health professions. HHS recognizes dentists and physicians as small business entities. In an effort to reduce the burden on these health professionals and/or small business entities, the information being collected has been kept at the minimum required to achieve the intended purpose of the TCH website. In addition, the course/unit evaluation questions and follow up surveys, focus group moderator's guide protocol, and key informant interview protocols all undergo rigorous review to achieve the intended purpose of this feedback mechanism while minimizing respondent burden. In accordance with industry standards, focus group participants receive remuneration appropriate for their time.

6. Consequences of Collecting the Information Less Frequent Collection

There are no legal obstacles that would prevent the reduction of burden on the respondent. The TCH website requires that registrants submit their information only once as part of the initial registration process. Information requested by course/unit evaluation questions is required only once, upon a user's completion of a program. One-time participation in follow-up activities (i.e., follow-up survey, focus group, key informant interview) is requested from those respondents consenting to such participation. No data is collected periodically. There are no increases of the burden on registrants/respondents.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances that would result in data collection outside of this process.

8. Comments in Response to the Federal Register Notice/Outside Consultation

A 60-day Federal Register Notice was published in the *Federal Register* on May 17,

2022, vol. 87, No. 95; pp. 29869 (see **Attachment G**). There were/were no public comments.

Another System of Records Notice (SORN) does not need to be submitted, as this request is to approve an extension to a currently approved collection, not a new approval.

As required by the Privacy Act (5 U.S.C. § 552a) (**Attachment H**), because some of the information being collected from respondents is about individuals and will be retrieved by name or other personal identifier, a System of Records Notice (SORN) was submitted to OMB for review concurrently with submission of the original Supporting Statement of the currently approved collection. The TCH SORN, in addition to published website policies, policies and the Privacy Act Statement which is included on each online registration screen, provide individual notice and public notification as to the purposes for which information being collected will be used, disclosed, and retained.

9. Explanation of any Payment/Gift to Respondents

Remuneration in the form of monetary incentives commensurate with industry standards for the respondent type, length of focus group, and any required prior activities associated with participation are provided to those respondents participating in focus groups.

10. Assurance of Confidentiality Provided to Respondents

Information being collected is voluntarily provided by respondents. Access to the information is limited to agency contractors, consultants, or HHS grantees. Access is granted via role-based responsibilities. The system is password protected, encrypted and the operating system is secure. Any reports summarizing user demographics or program feedback will provide results in aggregate. No individual-level information will be published.

11. Justification for Sensitive Questions

The purpose of the data collection is to collect information that facilitates the creation of a unique user profiles to monitor information, such as training records, and to ensure that the e-learning curricula and e-resources offered by TCH are relevant, useful, and appropriate to their target audiences, which involves collecting opinions and feedback about TCH programs directly from a user. To accomplish this, it is necessary to collect specific types of PII such as first and last name, race/ethnicity,

and sex to reduce the likelihood that a single record could be mistaken for any other individual than that which it is intended and to inform respondent screening and inclusion. To reduce the burden on respondents, the collection of PII is limited to the minimum amount of information required to provide reasonable and confident identification of a single registrant and to screen based on inclusion criteria.

12. Estimates of Annualized Hour and Cost Burden

While the TCH website features are open and available to the public, the majority of respondents are in the health and health care professions. Each respondent registers as a single user. The TCH website requires that respondents submit their information only once as part of the initial registration process. Information requested by course/unit evaluation questions, follow-up surveys, focus groups, and key informant interviews is required only once, upon a user’s completion of a program. There are no requirements for annual responses.

On average, it took 3 minutes for a respondent to complete the online registration form. On average, it took 5 minutes for a respondent to complete the course/unit evaluation questions and took 10 minutes for a respondent to complete the follow-up survey. On average, it will take approximately 2 hours for participation in a focus group, and 1 hour for completion of a key informant interview (these time frames are within the ranges specified as industry standards for focus groups and key informant interviews).

12A. Estimated Annualized Burden Hours

Form Name	Type of Respondent	No. of Respondent	No. Responses per Respondent	Average Burden per Response (hours)	Total Burden (hours)
TCH Registration Form	Health and Health Care Professionals	9460	1.00	3/60	473
TCH Course/unit Evaluation Form	Health and Health Care Professionals	9460	1.00	5/60	788
TCH Follow-Up Survey	Health and Health Care Professionals	4208	1.00	10/60	701
TCH Focus Group Moderator’s Guide	Health and Health Care Professionals	15	1.00	120/60	29

TCH Key Informant Interview Protocol	Health and Health Care Professionals	13	1.00	60/60	13
TOTAL					2004

These are not annual collections. These are each a one-time collection used for registration or for user feedback purposes on programs offered by the TCH website. Though there are no annual burden costs to respondents, a one-time cost can be calculated.

The **registration form** does not collect salary information pertaining to respondents as part of the data collection; therefore, figures were based on statistics provided by the Department of Labor. Using the latter, it was determined that the national average hourly wage for the types of respondents using the TCH website ranges from \$16.88 to \$93.74. This information was used to equate to an average \$43.83 (avg. *all* hourly wages) per hour for respondents. The average respondent is expected to complete each registration form in 0.05 hours, thus making the cost of burden $\$43.83 \times 0.05 \text{ hours} = \2.19 , a one-time total respondent cost burden per form.

The **course/unit evaluation questions** do not collect salary information pertaining to respondents as part of the data collection; therefore, figures were based on statistics provided by the Department of Labor. Using the latter, it was determined that the national average hourly wage for the types of respondents using the TCH website ranges from \$16.88 to \$93.74. This information was used to equate to an average \$43.83 (avg. *all* hourly wages) per hour for respondents. The average respondent is expected to complete the course/unit evaluation questions in 0.0833 hours, thus making the cost of burden $\$43.83 \times 0.0833 \text{ hours} = \3.65 , a one-time total respondent cost burden per course/unit evaluation question set.

Respondent salary information is not collected as part of the **follow-up survey questions**; therefore, figures were based on statistics provided by the Department of Labor. Using the latter, it was determined that the national average hourly wage for the types of expected respondents ranges from \$16.88 to \$93.74. This information was used to equate to an average \$43.83 (avg. *all* hourly wages) per hour for respondents. The average respondent is expected to complete each form in 0.1667 hours, thus making the cost of burden $\$43.83 \times 0.1667 \text{ hours} = \7.31 , a one-time total respondent cost burden per follow-up survey.

Respondent salary information is not collected as part of the **focus group or key informant interview** demographic questions; therefore, figures were based on statistics provided by the Department of Labor. Using the latter, it was determined that the national average hourly wage for the types of expected respondents ranges from \$16.88 to \$93.74. This information was used to equate to an average \$43.83 (avg. *all* hourly wages) per hour for respondents. The average respondent is expected to complete a focus group in 2 hours maximum and a key informant interview in 1 hour maximum, thus making the cost of burden for focus group participation $\$43.83 \times 2 \text{ hours} = \87.66 ; and the cost of burden for key informant interview participation $\$43.83 \times 1 \text{ hour} = \43.83 . Each of these calculations reflects a one-time total respondent cost

burden for the respective data collection method.

12B. Estimated Annualized Burden Costs

Form Name	Type of Respondent	Total Burden (hours)	Hourly Wage Rate	Total Respondent Costs
TCH Registration Form	Health and Health Care Professionals	473	\$43.83	\$20,732
TCH Course/unit Evaluation Form	Health and Health Care Professionals	788	\$43.83	\$34,538
TCH Follow-Up Survey	Health and Health Care Professionals	701	\$43.83	\$30,725
TCH Focus Group Moderator's Guide	Health and Health Care Professionals	29	\$43.83	\$1,271
TCH Key Informant Interview Protocol	Health and Health Care Professionals	13	\$43.83	\$570
TOTAL		2,004		\$87,836

13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There is no burden of cost to respondents as the collection participation is voluntary and free to respondents. Monetary incentives commensurate with industry standards for the respondent type, length of focus group, and any required prior activities associated with participation are provided to focus group participants. HHS assumes the burden of cost pertaining to the maintenance and acquisition of necessary equipment (i.e., computer hardware and software) associated with the collection.

14. Annualized Cost to Federal Government

An estimated \$16,000.00 will be spent for development and operational costs to launch the TCH user registration form and course/unit evaluation questions, to conduct the focus groups and key informant interviews, and to disseminate follow-up surveys. Six technical staff, whose hourly salaries ranged from \$35.00 to \$55.00, will be involved in these activities. Approximately 400 hours of staff time will be devoted

to website activities, completing focus group and key informant interview activities, and follow-up survey activities. While there is no daily completion of all of these activities, it is estimated that annual operation and oversight of these activities will involve 2 technical staff, whose hourly salaries range from \$35 to \$70.

Approximately 500 hours of staff time is required annually to operate and maintain the user registration and course/unit evaluation question forms, conduct focus groups and key informant interviews, and conduct follow-up surveys. At an average of \$43.00 per hour, the annual cost to the Federal Government of these TCH data collection activities is approximately \$21,500.00.

15. Explanation for Program Changes or Adjustments

An adjustment has been made to correct an error in the burden estimates, resulting in a minimal decrease to the estimated burden hours and cost. Community Health Workers should not have been included as a unique type of respondent. The Health and Health Care Professionals type is inclusive of Community Health Workers. Thus, previous estimates associated with Community Health Workers have been subtracted. Program changes include the subtraction of questions from and the revision of response options on the registration form. Questions were subtracted for data that was no longer needed (i.e., age, street address, zip code). Response options were revised for clarification, for questions on sex, primary place of employment, role, and how the respondent heard about the e-learning program. The program changes were minimal and did not impact the burden estimate.

16. Plans for Tabulation and Publication and Project Time Schedule

The information being generated from this assessment will be used to understand trends in registration and content utilization for TCH's various programs, to inform targeted marketing efforts, to inform the development of future e-learning programs and resources, to inform the maintenance of current e-learning programs and e-resources; to generate certificates of credit/statement of participation for respondents of e-learning programs; and to assist in improving existing or future resources provided on the TCH website. The information being collected may be used for publication in the future. The time schedule of collection will be indefinite depending on the life of the system.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.