

## **A. Justification**

### **1. Circumstances Making the Collection of Information Necessary**

The Office of Healthcare Information and Counseling (OHIC) within the Administration for Community Living (ACL) hosts an annual national training conference for the federally funded programs that it administers. The audience for this training conference includes attendees from State Health Insurance Assistance Program (SHIP) and Senior Medicare Patrol (SMP) programs, which are two nationally recognized programs that provide Medicare information and counseling to Medicare beneficiaries and help, fight Medicare fraud through prevention and education. Grantee leadership is required to attend this training annually to ensure they receive critical information and technical assistance needed to help them successfully meet the requirements of their grant awards. Grantees are encouraged to bring up to three (3) people from each program. Programs operate in each of the 50 states, the District of Columbia, Guam, Puerto Rico, and the US Virgin Islands.

Section 4360(f) of OBRA 1990 created the State Health Insurance Assistance Program (SHIP) and requires the Secretary to support a national network of grantees to provide outreach and assistance to Medicare beneficiaries. In addition, under Public Law 104-208, the Omnibus Consolidated Appropriations Act of 1997, Congress established the Senior Medicare Patrol Projects in order to further curb losses to the Medicare program. The Senate Committee noted that retired professionals, with appropriate training, could serve as educators and resources to assist Medicare beneficiaries and others to detect and report error, fraud and abuse. This tool provides ACL an opportunity to assess the success and impact of the training provided to the SHIP and SMP grantees by ACL along with determining the future training needs of the program grantees. Section 301 of the Public Health Service Act (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,” 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.”

The information collected in this survey is necessary to ensure that ACL is meeting the technical assistance needs of the attendees and to capture valuable feedback to be used for future training meetings.

By gathering feedback on the quality of the training and content provided, we can ensure attendee satisfaction and gather information for future planning. ACL administers a contract to develop and provide the training conference evaluation tool for ACL's approval.

## **2. Purpose and Use of Information Collection**

The information obtained from this survey is used by federal employees of ACL. Specifically, the information is used to assess grantee satisfaction with the Annual SMP/SHIP National Training Conference. The results of the survey could lead to overall programmatic and training improvements, including the reallocation of resources, revisions to certain programmatic processes and policies, and/or development of guidance related to agency and federal partner policies and procedures. The results of the survey could also lead to improvements for Medicare beneficiaries, as improved customer service by the agency and grantees will lead to more appropriate Medicare choices for individual citizens, leading to monetary savings for both the individual and the SMP/SHIP programs. Ultimately, these changes could improve the services ACL provides to the public.

## **3. Use of Improved Information Technology and Burden Reduction**

This event evaluation will be electronic/internet based. OHIC's event contractor will prepare and test this tool and will disseminate the link to this voluntary evaluation to event participants at the end of each event day. The contractor will also provide timely technical assistance to event participants to have information technology needs. At time of submittal to OMB ACL is also including measures related to in person and virtual conference activities for COVID-19 precautions.

## **4. Efforts to Identify Duplication and Use of Similar Information**

This effort does not duplicate any other survey collection by ACL. ACL has not previously performed any data collections related to satisfaction with Annual SMP/SHIP National Training Conference. There is no known redundancy with this data collection.

## **5. Impact on Small Businesses or Other Small Entities**

This information collection has no impact on small businesses or other small entities.

## **6. Consequences of Collecting the Information Less Frequent Collection**

Without this information collection, ACL would not be able to measure satisfaction with Annual SMP/SHIP National Training Conference presentations and would be limited in its ability to implement improvements. Assessing how grantees value the information they receive during this event will allow for the development of future event enhancements.

In addition, ACL would not be able to meet the legal requirements pertaining to data collection and continuous improvement, including the March 3, 1998, White House Memorandum, E.O. 12862, and the Section 4360(f) of OBRA 1990.

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

The collection of information is consistent with 5 CFR 1320.5(d)(2), and there are no special circumstances with respect to reporting.

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

A 60-Day Federal Register Notice was published in Federal Register 88 FR 30764 pages 30764-30765 on Friday, May 12, 2023. No comments were received.

ACL worked with an internal group and external partners to verify the language and length of the survey instrument. Language for this survey was based on previous Annual SMP/SHIP National Training Conference evaluations and related feedback from past attendees, planning committees, and contractors was included to ensure effective, brief length and wording.

A 30-day Federal Register Notice published in the Federal Register 88 FR 48853 pages 48853-48854 on Friday, July 28, 2023.

#### **9. Explanation of any Payment/Gift to Respondents**

ACL will not provide payment or other forms of remuneration to participants.

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

There are no assurances of confidentiality. In addition to complying with these legislative standards, ACL will also take steps to explain to individual respondents the need for and value of this data collection. No confidential or personal identifiable information is associated with this information collection.

#### **11. Justification for Sensitive Questions**

No questions will be asked that are of a personal or sensitive nature as defined by OMB.

#### **12. Estimates of Annualized Hour and Cost Burden**

For this project, ACL will collect data once following the Annual SMP/SHIP National Training Conference. This evaluation will be sent to all event attendees, which is estimated to include maximum 526 participants. This is a voluntary survey and attendees are encouraged not required to complete this evaluation. Participants will be allowed one submission, only. ACL expects to obtain a maximum of 526 survey responses, and each survey is estimated at .25 hours to complete.

This time estimate is based on research performed by ACL with the existing survey instrument and in consideration of previous survey content and length.

The target number 486 is a result of 54 states/territories, each sending up to 9 conference participants who may be eligible to complete a survey ( $54 \times 9 = 486$ ). Factoring in an additional 40 non-grantee, non-federal partner event participants ( $486 + 40 = 526$ ). 526 respondents taking 15 minutes to complete for a total of 131.5 annual burden hours.

Estimates of annualized cost to respondents for the hour burdens for the survey are estimated at \$6,109.49. All survey responses will come from individuals who attended Annual SMP/SHIP National Training Conference sessions. Because there are no specific expectations in terms of employment status or experience, all individuals will be charged at the rate for "All Occupations," of \$23.23/hour, as defined by the Bureau of Labor Statistics' "Occupational Employment Statistics." This number is increased by a factor of 100% to account for benefits and overhead, resulting in a rate of \$46.46/hour.

As a result, ACL estimates an approximate aggregate cost to respondents of \$6,109.49 each year. This estimate is based on the per hour valuations of respondents' time noted in table A-12-2.

The complete estimated, annualized burden can be seen in Table 12A:

**Table 12A**

<b>Total Estimated Annualized Burden Hours</b>			
<b>Number of Respondents</b>	<b>Responses per Respondents</b>	<b>Average burden hours per response</b>	<b>Total Burden Hours</b>
526	1	15 minutes	131.5

**12B.** The Department of Labor website was used to determine appropriate wage rates for respondents:

<b>Table 12B. Estimated Annualized Cost to Respondent for the Hour Burdens</b>		
<b>Total Burden Hours</b>	<b>Hourly Wage Rate*</b>	<b>Total Respondent Costs</b>
131.5	\$46.46	\$6,109.49

\*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://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)

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

ACL has not identified any capital, start-up, or maintenance of capital costs associated with this proposed collection of information.

### **14. Annualized Cost to Federal Government**

This project will occur once annually. Major fluctuations in cost are not expected, totals are based on the 2023 OPM wages and summary tables and contractor costs. The estimated annual cost to the Federal Government totals **\$201,685.48**

An ACL staff member at a GS-15/5 taking two hours at the rate of \$ 84.55 for a total of \$169.10.

A GS-14/5 taking 15 hours at the rate of \$71.88 for total of \$1,078.20.

A GS-14/5 taking two hours at the rate of \$71.88 for a total of \$ 143.76

A GS-14/5 taking two hours at the rate of \$71.88 for a total of \$143.76.

A GS-13/5 taking two hours at the rate of \$60.83 for a total of \$121.66.

ACL expects the survey's contractor costs to be approximately \$200,029. This amount includes all costs related to reporting, survey administration, survey development, and communication between the contractor and ACL.

<b>Table A-14-1. Estimated Cost Analysis per FTE<sup>1</sup></b>			
Grade	Hours	Rate	Total Cost
GS 15/5	2	\$ 84.55	\$ 169.10
GS 14/5	15	\$71.88	\$ 1078.20
GS 14/5	2	\$71.88	\$ 143.76
GS 14/5	2	\$71.88	\$143.76
GS 13/5	2	\$ 60.83	\$ 121.66
<b>Fed Gov Costs</b>	<b>23</b>		<b>\$ 1,656.48</b>
<b>Total Fed Gov Costs</b>			<b>\$201,685.48</b>

<sup>1</sup> Source: OPM 2023 Salary Table [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB\\_h.aspx](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/23Tables/html/DCB_h.aspx). All Grades are listed at Step 5 and include an additional 100% for fringe benefits and overhead.

### **15. Explanation for Program Changes or Adjustments**

There is a program change increase of 162 respondents and a 41 annual burden hour increase. ACL assessed usage of the evaluation and increased number of possible attendees causing a program change increase, there are no revisions to the conference evaluation.

### **16. Plans for Tabulation and Publication and Project Time Schedule**

An internal report will be prepared once all submissions have been received, calculated, and analyzed. At this time, ACL does not plan to make this report public, but will supply states/territories with an analysis of overall event satisfaction results via webinar presentation and word-of-mouth. Assuming this project has been approved and is ready to begin on July 15, 2023, 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: Annual SMP/SHIP Training Conference Time Schedule**

<b>Preparation</b>	<b>1</b>	<b>Finalization of evaluation</b>	7/15/23	7/15/24	7/15/25
	<b>2</b>	<b>Evaluation training</b>	07/27/23	07/27/24	07/27/25
<b>Administration &amp; Analysis</b>	<b>3</b>	<b>Training Conference</b>	07/25/23 – 07/27/23	07/25/24 – 07/27/24	07/25/25 – 07/27/25
	<b>4</b>	<b>Evaluation link disseminated</b>	07/27/23	7/27/24	07/27/25
	<b>5</b>	<b>Evaluation submission deadline</b>	08/10/23	08/10/24	08/10/25
	<b>6</b>	<b>Analysis</b>	8/11/23	08/11/24	08/11/25
	<b>7</b>	<b>Conclusion of analysis</b>	10/11/23	10/11/24	10/11/24
<b>Reporting</b>	<b>8</b>	<b>Report disseminated internally</b>	10/12/23	10/12/24	10/12/25
	<b>9</b>	<b>Report results disseminated externally</b>	10/14/2023	10/14/24	10/14/25

OHIC staff will notify attendees about the opportunity to complete an evaluation at the conclusion of each event presentation. Event contractors will be available to answer questions or provide assistance if requested but will not otherwise interact with the respondents or supply or suggest answers.

Materials related to survey completion (computer, internet access) will be provided by event participants. After the event, event contractor will compile, and aggregate completed survey results. OHIC staff will provide ongoing technical assistance as needed.

**17. Reason(s) Display of OMB Expiration Date is 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 on the survey

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification.