“Environmental Health and Land Reuse Certificate Training”

(formerly “Assessment of Environmental Health and Land Reuse Certification Training”)

OMB Control No. 0923-0060, discontinued 08/31/2022

Reinstatement with Change

Supporting Statement Part A –

Justification

Program Official/Project Officer: Laurel Berman

Title: National Brownfields Coordinator, Environmental Health Scientist

Phone: 312-315-7011

Email: fjq0@cdc.gov

Fax: 312-886-6066

Date: 07/19/2023

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Part A. Justification

**Goal of study:** The goal of the information collection is to collect participant training information, such as classroom and conference registration and self-assessment related to environmental health and land reuse course content develop by ATSDR.

**Intended use of resulting data:** ATSDR will use data from this information collection to assess the impact of participation in the certificate courses, such as increased capacity to perform work. Ultimately, ATSDR is interested in long-term benefits of the certificate courses, such as state health partners engaging more frequently in land reuse and redevelopments projects.

**Methods to be used to collect data:** ATSDR will use an online secure web application, Research Electronic Data Capture (REDCap), to collect standardized data such as self-assessments after each course module. For classroom course registration, ATSDR will provide a REDCap link on an ATSDR website or through email. Otherwise, participants will register for training sessions using conference portals. Privacy Act opt-out forms will be administered hardcopy and in-person at trainings by the ATSDR course director.

**Subpopulation to be studied:** Environmental professionals; students of environmental science, public health, or planning; and local or state health agency professionals.

**How data will be analyzed:** ATSDR ma use Excel or other spreadsheet software to characterize certificate course participants (e.g., by job title) and to summarize their feedback on the course content and effectiveness.

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

**Goal of the study:** The goal of the information collection is to collect participant training information, such as classroom and conference registrations and self-assessments related to environmental health and land reuse course content developed by ATSDR.

**Intended use of the resulting data:** ATSDR will use data from this information collection to assess the impact of participating in the certificate courses, such as increased capacity to perform work. Ultimately, ATSDR is interested in long-term benefits of the certificate courses, such as state health partners engaging more frequently in land reuse and redevelopment projects.

**Methods to be used to collect:** ATSDR will use an online secure web application, Research Electronic Data Capture (REDCap), to collect standardized data such as self-assessments after each course module. For classroom course registration, ATSDR will provide a REDCap link on an ATSDR website or through email. Otherwise, participants will register for training sessions using conference portals. Privacy Act opt-out forms will be administered hardcopy and in-person at trainings by the ATSDR course director.

**Subpopulation to be studied:** Environmental professionals; students of environmental science, public health, or planning; and local or state health agency professionals.

**How data will be analyzed:** ATSDR may use Excel or other spreadsheet software to characterize certificate course participants (e.g., by job title) and to summarize their feedback on the course content and effectiveness.

ATSDR is requesting a three-year Paperwork Reduction Act (PRA) clearance for a reinstatement with change information collection request (ICR) entitled “Environmental Health and Land Reuse Certificate Training” (formerly “Assessment of Environmental Health and Land Reuse Certification Training”), also referred to as an EHLR certificate course or certificate training. ATSDR is continuing to provide the classroom-based “EHLR Basic Course” and will add the new conference-based “Immersion Training.”

A 2016 National Environmental Health Association (NEHA) study identified significant gaps in environmental health education related to potentially contaminated sites such as brownfields. Due to the prevalence of such sites, ATSDR partners with NEHA to build capacity among environmental professionals through the certificate course trainings. The certification is geared toward NEHA members and ATSDR stakeholders who are environmental professionals; local and state health agency employees; planners; environmental consultants; environmental non-profits; and students in environmental science, environmental/public health, and planning.

The certificate began as a collaboration between ATSDR and NEHA under a cooperative agreement (funded through July 2023) as well as their long-standing (unfunded) partnership. ATSDR created the content for the “Environmental Health and Land Reuse” (EHLR) training. ATSDR maintains and supports 10-hour classroom EHLR trainings, referred to as the “EHLR Basic Course” and will add the new conference-based “EHLR Immersion Training.” [[1]](#footnote-2) NEHA continues to support ATSDR with course credentialing and certification for ATSDR’s EHLR trainings.

Modifications in the ICR reflect a change in the training administration. Previously, the training was to be administered under the CDC [Training and Continuing Education Online (TCEO) system](http://www.cdc.gov/getce) (see “Application for Training” [OMB Control No. 0920-0017; expiration date 09/30/2025]). ATSDR has decided to move away from TCEO, to focus on its own classroom training and to collect its own course registration and participant self-assessment information. Therefore, ATSDR plans an annual enrollment of 225 respondents in the suite of EHLR trainings (the 10-hour classroom-based “EHLR Basic Course” and the 20-hour virtual or live conference-based “Immersion Training”), which is an increase of 25 respondents over the previously approved 200 respondents per year. The addition of registration and self-assessment forms and the completion and discontinuation of the follow-up survey under the previous ICR, will result in 1,600 annual responses, which is an increase of 1,400 over the previously approved 200 responses for the follow-up survey. The total time burden is estimated to be 145 hours, which is an increase of 78 hours over the previously approved 67 hours. More details about the requested ICR changes are provided in Section A.15.

ATSDR is authorized to conduct this EHLR training under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA) (Attachment 1).

The 60-day Federal Register Notice (Attachment 2) was published on 04/07/2023 and is further discussed in Section A.8.

# A.2. Purpose and Use of the Information Collection

The ATSDR’s EHLR suite of certificate programs consist of a classroom 10-hour EHLR Basic course hosted on ATSDR’s Land Reuse website, plus a virtual or live EHLR Immersion conference training held two to four times per year. This reinstatement with change ICR covers the ATSDR classroom “EHLR Basic Course” and the new conference based “EHLR Immersion Training.”

The purpose of the information collection is to evaluate the job titles of participants (e.g., environmental health scientist, student in environmental health, environmental professional, other) collected via registration and to evaluate course component data to assess the effectiveness of the certification.

The EHLR training content focuses on increasing skills in land reuse and redevelopment through the integration of epidemiology, risk assessment, risk communication, and toxicology concepts and resources. The certification goals and course objectives are:

1. Increase participant awareness and knowledge of environmental health and land reuse;
2. Increase skills and capacity of participants to engage in EHLR work; and
3. Assess participant feedback and evaluate their increased awareness, skills, and knowledge in environmental health and land reuse.

*EHLR Accomplishments*

Based on EHLR trainings from 2019 to 2022, the training is shown to increase participants’ capacity and skills to engage in environmental health work related to land reuse. An initial evaluation of participant pre- and post-test competencies (these are no longer included in the Basic training) indicates large improvements from pre- to post-training, regardless of training modality (e.g., ATSDR classroom vs. NEHA online asynchronous). Voluntary self-assessments (knowledge assessments) completed by many of the participants indicate that the training in general increases their skills and understanding of environmental health and land reuse and motivates them to learn more about land reuse.

Under the previous PRA clearance, ATSDR conducted the one-time follow up of the 10-hour “EHLR Basic Course” in May and June of 2022. The follow up was conducted within 12 months post-training for a subset of training participants. The evaluation data and feedback information helped ATSDR determine impacts of the EHLR Basic certificate course in building capacity and skills among environmental professionals in environmental health and land reuse. In addition, ATSDR used the feedback from course participants to enhance existing course materials or create new materials. ATSDR and NEHA may publish the results of the evaluation or use the information to inform the development of additional individual or collaborative environmental health and land reuse resources.

*Registration for “EHLR Basic Course” and “EHLR Immersion Training”*

ATSDR has developed a general online registration form for both the “EHLR Basic Course” and the “EHLR Immersion Training” in the REDCap (Research Electronic Data Capture) system (Attachment 3).

* For the “EHLR Basic Course,” ATSDR’s Land Reuse Program will post the link to online registration (Attachment 3) on their EHLR training website, or the Land Reuse Team Lead can email the link to participants who request it. ATSDR estimates that registration for the EHLR Basic Course to be 3 minutes per response. In rare circumstances where online registration is not available, a hard copy (paper and pen) form may be filled out by participants.
* For the “EHLR Immersion Training,” the registration may be external to ATSDR as part of conference events at which ATSDR will provide the training (Attachment 3a), or through ATSDR (Attachment 3). ATSDR estimates that registration for the “EHLR Immersion Training” session using conference platforms will require the same time burden (3 minutes per response). We provide sample conference registration websites in Attachment 3a but will use Attachment 3 to represent this online registration time burden.

*10-hour classroom-based “EHLR Basic Course”*

The classroom version of the certificate program will be publicly available and maintained on ATSDR’s Land Reuse Program website. As part of equity and inclusion practices, ATSDR initially determined that a classroom version of the training could be useful for populations with limited broadband or who preferred live training. Three years later, ATSDR continues to receive requests for the classroom training, such as for an annual summer internship program at Diné College in Navajo Nation, for the Institute for Tribal Environmental Professionals at the annual Tribal Lands and Environment Forum, and for the Annual Navajo Economic Summit.

This reinstatement with change ICR will add the following information collections specifically for ATSDR’s classroom EHLR trainings.

Self-assessments for each of the five training modules (link provided within training slides) will be offered (Attachments 4a-4e). The five training modules are:

1. Engaging with Your Community (2 hours)
2. Evaluating Environmental and Health Risks (2 hours)
3. Communicating Environmental and Health Risks to the Community (2 hours)
4. Redesigning with Health in Mind (2 hours)
5. Measuring Success (2 hours)

*20-hour conference-based “EHLR Immersion Training”*

ATSDR is also planning a second mode of instruction for supplemental “EHLR Immersion Training.”

Self-assessments for each of the three training modules will be offered (Attachments 5a-5c). The three training modules are:

1. Community Engagement (8 hours),
2. Evaluating Environmental and Health Risks (8 hours), and
3. Communicating Environmental and Health Risks (4 hours).

ATSDR and NEHA intend to collaboratively offer the proposed “EHLR Immersion Training” two to four times per year. The training will be offered as a face-to-face session at environmental conferences to those who have successfully completed the corresponding prerequisite Module 1, 2, or 3 of the “EHLR Basic Course”. Immersion trainings can be offered for one, two, or all three modules. The assessments will be offered electronically as a link in the course materials or slides, or in rare cases where Wi-Fi may not be available, by paper and pen format.

*Course Completion and Credentialing*

ATSDR continuing education credits will be issued by NEHA for participants who complete the “EHLR Basic Course” and the new conference based “EHLR Immersion Training.” NEHA is offering Certificates of Completion for ATSDR because they are the recognized credentialing entity for many environmental professionals among the training target audience. For example, they offer a Registered Sanitarian Certification and Food Safety/Food Handling courses that issue a certificate.

For the full 5-module “EHLR Basic Course”, upon verification of eligibility by the ATSDR course director, NEHA will issue 10 CEUs total and one Certificate of Completion in Environmental Health and Land Reuse. For participants who complete only individual modules, NEHA will issue individual Certificates of Completion per module, designated by name and time, as: Engaging with Your Community (2 hours), Evaluating Environmental and Health Risks (2 hours), Communicating Environmental and Health Risks to the Community (2 hours), Redesigning with Health in Mind (2 hours), and Measuring Success (2 hours).

For the “EHLR Immersion Training,” upon verification of eligibility by the ATSDR course director, NEHA will issue as many as 20 CEUs total, broken into three individual modules with three individual Certificates of Completion in: Community Engagement (8 hours), Evaluation of Environmental and Health Risks (8 hours), and Communicating Environmental and Health Risks (4 hours).

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

Participants in the “EHLR Basic Course” and in the “EHLR Immersion Training” will complete registration online (Attachment 3 – online; Attachment 3a – sample). The time per response for EHLR training takes less than 3 minutes.

Self-assessments for the “EHLR Basic Course” and in the “EHLR Immersion Training” will be completed online via a link posted in the course materials or slides (Attachments 4a-4e [online] and Attachments 5a-5c [online]).

In the rare and unusual circumstance that online connectivity is not possible, ATSDR will provide hard copies of the ATSDR registration forms and self-assessments as a backup, to be filled in by participants (i.e., pen and paper).

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

Searches in the scientific literature identified only a few specific examples of health agency roles in land reuse or environmental health activities. Most studies more broadly addressed capacity of local health agency professionals to perform or build capacity in areas such as evidence-based decision-making (Jacobs, Duggan, Erwin, Borawski, & Compton, 2014), assessing competencies to engage in community based public health (Parker, Margolis, & Henrizuez-Roldan, 2003), or population health improvement (Rodriguez, McCullough, & Hsuan, 2014). From May to June 2016, NEHA evaluated their membership to identify a baseline capacity of local health department (LHD) staff and environmental health professionals to address environmental health and land reuse issues. There were 109 respondents, of which 93 (85%) indicated they were LHD professionals. At any time 5-75% of LHD employees reported performing tasks in any of these five environmental health areas: Risk Communication, Risk Assessment, Epidemiology, Toxicology, and Land Reuse and Redevelopment. The majority of respondents reported “no” to only some formal education in these topics (Berman, DeFlorio-Barker, & Whitehead, S., 2019). While their roles are not well documented in the scientific literature, state and local public health agencies are involved in these arenas through programs such as ATSDR funding or technical assistance and the Environmental Protection Agency’s (EPA) promotion of engagement with health agencies in their brownfields funding process. Through past ATSDR grant funding, several LHDs across the U.S. were involved in brownfields redevelopment and community health projects. Their projects ranged from programs to reduce exposures, communication of risks of exposures, transforming vacant land into agriculture projects, and health promotion and education about land reuse. Other LHDs provided free technical assistance to communities with land reuse issues.

The ATSDR Environmental Health and Land Reuse (EHLR) Certificate Program is specifically designed to increase capacity of environmental professionals (e.g., state or LHD professionals) to engage in health-focused land reuse activities. The ATSDR Land Reuse Program has not hosted a training like this prior to an initial EHLR pilot in August 2019. If requested by colleagues, ATSDR will coordinate efforts with other colleagues who may also work with NEHA on similar efforts. For example, ATSDR will offer to assist colleagues should they have similar information collection needs.

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

Participants in the certification course will be individuals, primarily from state, tribal, local, and territorial government agencies. There will be no impact or burden on small businesses.

# A.6. Consequences of Collecting the Information Less Frequently

The information collection will begin at the time of participant registration for an EHLR training and upon completion of the training through a voluntary self-assessment.

If the information collection is not conducted, ATSDR will not be able to assess the impacts of the certification to increase the capacity of participants to perform environmental health and land reuse activities.

There are no technical or legal obstacles to reducing burden.

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

There are no special circumstances of the ICR. This request fully complies with the regulation 5 CFR 1320.5.

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

1. A 60-day Federal Register Notice was published in the *Federal Register* on April 7, 2023, Vol. 88, No. 67, pp. 20890-92 (Attachment 2).

ATSDR did not receive public comments related to this notice.

1. ATSDR did not consult with persons outside of the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. This is a reinstatement with change ICR that will collect information that typically has not been collected in the ATSDR Land Reuse Program activities.

ATSDR may summarize de-identified data to discuss and share with partners from National Environmental Health Association (NEHA) and one academic stakeholder. The partners include Sharon Unkart, Instructional Designer, NEHA; Becky Labbo, Program Evaluator, NEHA; and Serap Erdal, University of Illinois Chicago. ATSDR intermittently informs these partners about aspects of the data collection and will share preliminary results to facilitate collaborative development of manuscripts and presentations.

# A.9. Explanation of Any Payment or Gift to Respondents

ATSDR is not providing any incentives to certification course participants to register for EHLR training or to complete the voluntary self-assessment. Participants who complete the certificate training will earn credit (e.g., continuing education hours) and a Certificate of Completion.

# A.10. Protection of the Privacy and Confidentiality of Information Provided by Respondents

On 03/21/2023, the CDC Senior Official for Privacy reviewed this submission and determined that the Privacy Act does apply. A Privacy Impact Assessment (PIA) was obtained (Attachment 6).

The applicable System of Records Notice is [SORN 09-20-0161 (Records of Health Professionals in Disease Prevention and Control Training Programs, HHS/CDC/NCPS)](https://www.hhs.gov/foia/privacy/sorns/09200161/index.html). Name of individual respondent, identification number, and type of training received are some of the indices used to retrieve records from this system.

SORN history: 51 FR 42449 (11/24/86); updated 54 FR 47904 (11/17/89), 56 FR 66733 (12/24/91), 57 FR 62811 (12/31/92), 58 FR 69048 (12/29/93), 59 FR 67080 12/28/94, 76 FR 4478 (1/25/11), \*[83 FR 6591](https://www.federalregister.gov/documents/2018/02/14/2018-03014/privacy-act-of-1974-system-of-records) (2/14/18)

Activities do involve the collection of individually identifiable information (IIF) for classroom registration (Attachment 3) and for conference registration (Attachment 3a). The following IIF Categories apply to this information collection:

❑ Name

❑ Mailing Address (e.g., by classroom/conference host websites)

❑ Phone Numbers (e.g., by classroom/conference host websites)

❑ Email Address

❑ Employment Status (i.e., place of employment or job title)

IIF (name and email address) will be shared with NEHA to issue Certificates of Completion and continuing education units (CEUs) upon verification by the ATSDR course director. Once the ATSDR course director confirms that the certificates were received, NEHA will destroy the records (e.g., emails and certificates).

The ATSDR Course Director will inform participants that they may take the training but still opt out of sharing their IIF with NEHA and thus not receive Certificates of Completion and CEUs. Should any participants choose to opt out of sharing IIF, they can complete Attachment 3b by hard copy (pen and paper). The ATSDR course director will then scan the opt out forms, shred the paper copies, and manage the scanned forms following the records control procedures described in Safeguard Number 4, below.

The following security measures are in place:

**Safeguards:**

1. Authorized users: Access is granted to only a limited number of personnel, i.e., CDC (ATSDR) Project Officer, interviewers, and designated support staff of CDC (ATSDR) or its contractors, as authorized by the system manager to accomplish the stated purposes for which the data in this system have been collected.

2. Physical safeguards: Locked cabinets in locked rooms, 24-hour guard service in buildings, personnel screening of visitors, electronic anti-intrusion devices in operation at the Federal Records Center, fire extinguishers, overhead sprinkler system and card-access control equipment in the computer room, computer terminals and automated records located in secured areas.

3. Procedural safeguards: Protection for computerized records includes programmed verification of valid user identification code, account code and password prior to acceptance of a terminal session or job submission, frequently changed passwords, and Vault Management System. Knowledge of individual tape passwords is required to access tapes, and access to systems is limited to users obtaining prior supervisory approval. When Privacy Act tapes are scratched, a special "certified" process is performed in which tapes are completely written over to avoid inadvertent data disclosure. Additional safeguards may be built into the program by the system analyst as warranted by the sensitivity of the data.

CDC and contractor employees who maintain records are instructed to check with the system manager prior to making disclosures of data. When individually identified data are being used in a room, admittance at either CDC or contractor sites is restricted to specifically authorized personnel. Privacy Act provisions are included in contracts, and the CDC Project Director, contract officers and project officers oversee compliance with these requirements. Upon completion of the contract, all data will be either returned to CDC or destroyed, as specified by the contract.

4. Implementation guidelines: The safeguards outlined above are developed in accordance with Chapter 45-13, "Safeguarding Records Contained in Systems of Records," of the HHS General Administration Manual, supplementary Chapter PHS.hf: 45-13; Part 6, "Automated Information System Security," of the HHS Information Resources Management Manual; the National Bureau of Standards Federal Information Processing Standards (FIPS Pub. 41 and FIPS Pub. 31). FRC safeguards are in compliance with GSA Federal Property Management Regulations, Subchapter B--Archives and Records.

**CDC/ATSDR Records Control Schedule** (see [**https://intranet.cdc.gov/ocoo/docs/services/ATSDR-retention-schedules.docx**](https://intranet.cdc.gov/ocoo/docs/services/ATSDR-retention-schedules.docx)):

Retention and destruction of PII will follow CDC/ATSDR Records Control Schedule Part 3-1: Trainee Records (NC1-90-78-1, Item 116) which states that the authorized disposition is to transfer to the Federal Records Center three years after last contact with trainee; destroy when seven years old. Trainee records include individual trainee records, including applications, qualifications, course title, evaluations, test scores, opt out forms, and related materials.

All incidents involving a suspected or confirmed breach of Personally Identifiable Information (PII) must be reported to OCISO according to the policy titled “OCISO/CDC Standard for Responding to Breaches of Personally Identifiable Information (PII).

# A.11. Institutional Review Board (IRB) and Justification for Sensitive Questions

Initially, the project, entitled “Assessment of Environmental Health and Land Reuse Certification Training” (currently titled “Environmental Health and Land Reuse Certificate Training”) was classified as human subjects research in which CDC was engaged (CDC IRB Protocol No. 7175). Recently, the NCEH/ATSDR Human Subjects Contact issued a revised determination that this activity is non-research on March 2, 2022. The Land Reuse Program Lead subsequently requested a closure of the protocol from IRB review. The closure was approved on May 10, 2022. This project has a project determination (STARS), provided along with the closure approval (Attachment 7).

No information that is sensitive, such as sexual identification, orientation, preferences, or behaviors; social security numbers; medical conditions; or any other information that may be regarded as personal or sensitive is asked or obtained.

# A.12. Estimates of Annualized Burden Hours and Costs

ATSDR estimates that a total of 225 participants will register for either the “EHLR Basic Course” (n=100) or the “EHLR Immersion Training” (n=125). Overall conference registration for trainings is estimated to take about 10 minutes to complete (Attachment 3a – sample); however, registration for the “EHLR Immersion Training” conference session itself is still estimated to be 3 minutes. For this reason, we are estimating the time burden per response for EHLR course registration across both courses are the same and are represented in a single combined row in the burden table.

For burden hour estimation, ATSDR assumes that all 100 registered students in the “EHLR Basic Course” have completed all five modules and are ready to complete their voluntary self-assessments. Participants who download the EHLR Basic Course and teach it (e.g., in a college or workplace class) or complete it themselves, may complete these modules individually or in full, on a schedule spread over several months or even more than one year.

For the supplemental “EHLR Immersion Training,” ATSDR estimates that 125 conference goers annually will meet the prerequisite certification requirement.

ATSDR estimates that no more than 5% of participants (n=11) would ever choose to opt out of sharing their IIF with NEHA. In the event this should occur, ATSDR is seeking approval to administer the EHLR Privacy Act Opt Out Form (Attachment 3b) to document this has occurred. The Privacy Act Opt Out Form is estimated to take one minute to complete.

Table 12.1 Estimated Annualized Burden Hours

| Type of Respondent | Form Name | Number of Respondents | Number of Responses per Respondent | Average Burden per Response (in hr.) | Total Burden (in hr.) |
| --- | --- | --- | --- | --- | --- |
| Environmental Health Professionals and Affiliates | EHLR Registration Form (Basic/Immersion) (online)  | 225 | 1 | 3/60 | 11 |
| EHLR Privacy Act Opt Out Form (Basic/Immersion) | 11 | 1 | 1/60 | 1 |
| EHLR Basic Course Module 1 Self-assessment (online) | 100 | 1 | 5/60 | 8 |
| EHLR Basic Course Module 2 Self-assessment (online) | 100 | 1 | 5/60 | 8 |
| EHLR Basic Course Module 3 Self-assessment (online) | 100 | 1 | 5/60 | 8 |
| EHLR Basic Course Module 4 Self-assessment (online) | 100 | 1 | 5/60 | 8 |
| EHLR Basic Course Module 5 Self-assessment (online) | 100 | 1 | 5/60 | 8 |
| EHLR Immersion Module 1 Self-assessment (online) | 125 | 1 | 15/60 | 31 |
| EHLR Immersion Module 2 Self-assessment (online) | 125 | 1 | 15/60 | 31 |
| EHLR Immersion Module 3 Self-assessment (online) | 125 | 1 | 15/60 | 31 |
| Total |  |  |  |  | 145 |

ATSDR uses the U.S. Department of Labor National Occupational Employment and Wage estimates, available at <https://www.bls.gov/oes/tables.htm> which posts estimates in the United States website (United States Department of Labor, 2022) for median hourly wages for a variety of occupations. ATSDR selected the median hourly wage of $36.77 for “19-2041  [Environmental Scientists and Specialists, Including Health](https://www.bls.gov/oes/current/oes192041.htm)” as representative of the professionals who may participate in the certification course.

Table 12.2 Estimated Annualized Burden Costs

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Type of Respondent | Form Name | Number of Respondents | Number of Responses per Respondent | Average Burden per Response (in hr.) | Median Wage per Hour | Total Cost |
| Environmental Health Professionals and Affiliates | EHLR Registration Form (Basic/Immersion) (online) | 225  | 1 | 3/60 | $36.77 | $413.66 |
| EHLR Privacy Act Opt Out Form (Basic/Immersion) | 11 | 1 | 1/60 | $36.77 | $6.74 |
| EHLR Basic Course Module 1 Self-assessment (online)  | 100 | 1 | 5/60 | $36.77 | $306.42  |
| EHLR Basic course Module 2 Self-assessment (online)  | 100 | 1 | 5/60 | $36.77 | $306.42 |
| EHLR Basic Course Module 3 Self-assessment (online)  | 100 | 1 | 5/60 | $36.77 | $306.42  |
| EHLR Basic Course Module 4 Self-assessment (online)  | 100 | 1 | 5/60 | $36.77 | $306.42  |
| EHLR Basic Course Module 5 Self-assessment (online)  | 100 | 1 | 5/60 | $36.77 | $306.42  |
| EHLR Immersion Module 1 Self-assessment (online)  | 125 | 1 | 15/60 | $36.77 | $1,149.06  |
| EHLR Immersion Module 2 Self-assessment (online)  | 125 | 1 | 15/60 | $36.77 | $1,149.06  |
| EHLR Immersion Module 3 Self-assessment (online)  | 125 | 1 | 15/60 | $36.77 | $1,149.06  |
| Total |  |  |  |  |  | $5,399.67 |

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

There are no additional burden costs to respondents and record keepers. ATSDR is supplying all materials for the certificate course. There are no start-up costs.

# A.14. Annualized Cost to the Federal Government

ATSDR has already created all materials that will be used in the EHLR certification trainings. In the fall of 2021 and ending July 31, 2022, NEHA was awarded a cooperative agreement amount of $75,000.00 from ATSDR to assist in the evaluation of the 10-hour certificate course and the pilot-scale development of the EHLR Immersion course modules. ATSDR awarded NEHA an additional $85,000.00 in a cooperative agreement for fiscal year (FY) 2023 for further EHLR certificate content development and collaborative delivery of courses.

Depending on future collaborative activities between ATSDR and NEHA related to EHLR training, NEHA may either work in an unfunded collaborative status or ATSDR additional funding for years two and three may occur at or below the $85,000.00 level for NEHA.

ATSDR’s Project Officer (the Land Reuse Program Lead) overseeing the development of the EHLR certification training estimates a contribution of 20 hours per week over 20 weeks in FY23 to continue with the evaluation of the EHLR basic, 10-hour course; and to collaboratively develop (with NEHA), pilot, and implement the EHLR Immersion content. Following the first 20 weeks, the ATSDR Project Officer estimates a contribution of 1 hour per week for 30 weeks to monitor progress of the ongoing EHLR training development and implementation. The Project Officer estimates a contribution of 4 hours per week for 50 weeks during years two and three of the EHLR certification training to monitor course progress, analyze participant information, and to potentially create a white paper, presentations, and/or commentary describing the certification course. Using a pay rate of $65/hour, the total costs for the Project Officer during year one (FY 23) are projected to be $27,950.00. During years two and three (FY 24 and FY 25), the total costs for the Project Officer are projected to be $13,000.00 each year ($26,000.00 over two years). The total annualized Project Officer costs are projected to be $53,950 over the three-year period, or an average of $17,983.33 per year.

Using a pay rate of $65/hour, the total costs for an ATSDR statistician to assist with the EHLR certificate evaluation and the writing of one to two manuscripts is 1 hour per week for 50 weeks in FY 23 and 1 hour per week for 10 weeks in FY 24. The total costs for the statistician are estimated to be $3,900.00 over two years or $1,950.00 per year.

For EHLR live/virtual trainings, one additional ATSDR staff may serve as an instructor in the trainings. The ATSDR staff is an environmental or health scientist with an estimated hourly salary of $65/hour. The ATSDR staff is estimated to provide 20 hours per year total of instruction over a three-year period, or 60 hours, totaling $3,900 over three years or $1,300 per year.

The total annualized cost to the federal government is estimated to be $116,233.33.

Table 14.1-Estimated Annualized Cost to the Federal Government

|  |  |
| --- | --- |
| Expenditure | Cost |
| Contract | $85,000 |
| ATSDR Salaries (total) | $21,233.33 |
| Travel for Site Visits (e.g., conferences) | $10,000 |
| Total  | $116,233.33 |

# A.15. Explanation for Program Changes or Adjustments

Previously under this ICR, ATSDR proposed to conduct a one-time collection of feedback (e.g., within 6-12 months after participation) using email information (addresses) of participants. This follow-up survey was designed to evaluate the subsequent use of the certificate program training materials and resources to build capacity and skills in environmental health and land reuse. This effort included an email survey invitation, an email reminder, and the online survey (on Research Electronic Data Capture, REDCap). The follow-up survey was voluntary and estimated to take a maximum of 20 minutes.

Under this reinstatement with change ICR, ATSDR proposes the following changes.

* Discontinue from PRA clearance, the previously approved one-time collection of feedback within 6-12 months after participation. The follow-up survey was completed before 08/31/2022, at which point the ICR was discontinued. The “EHLR Basic Course” content has been successfully established based on the feedback received to date.
* While under cooperative agreement, the registration and course management for both the online and classroom “EHLR Basic Course” were previously to be administered through the CDC Training and Continuing Education Online (TCEO) system under “Application for Training” (OMB Control No. 0920-0017; expiration date 09/30/2025). In this reinstatement with change ICR, ATSDR will no longer rely on TCEO, and instead is seeking its own PRA clearance for registration and post-course evaluation for its courses.
* Although the cooperative agreement is ending in July 2023, ATSDR and NEHA have agreed to continue their highly successful collaboration.
	+ NEHA will maintain, control, and administer its own non-sponsored online “EHLR Basic Course.” PRA clearance is not required for information collected by NEHA (registration and post-course evaluation).
	+ ATSDR will maintain, control, and administer the in-person, classroom “EHLR Basic Course.” ATSDR is adding new conference based “EHLR Immersion Training” for registrants who have completed the corresponding shorter module, Module 1, 2, or 3 in the “EHLR Basic Course” (either online or classroom based). PRA clearance is required for information collected by ATSDR (registration and self-assessments).
	+ NEHA has agreed to continue issuing training certificates and continuing education units on behalf of both its own online training and ATSDR’s training upon verification of eligibility by the agency’s course director.
	+ Both ATSDR and NEHA have agreed that future modifications to their respective courses’ content will occur in parallel to maintain consistency between the two partners.
* ATSDR plans an annual enrollment of 225 respondents in the suite of EHLR trainings (the 10-hour “EHLR Basic Course” and the 20-hour “Immersion Training”), which is an increase of 25 respondents over the previously approved 200 respondents per year for the follow-up survey alone.
* The addition of registration and evaluation forms will result in 1,600 annual responses, which is an increase of 1,400 over the previously approved 200 responses for the follow-up survey alone.
* The total time burden is estimated to be 145 hours, which is an increase of 78 hours over the previously approved 67 hours.

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

ATSDR and NEHA may prepare a joint presentation, short paper, or commentary about the use of the certificate course content and resources and the EHLR training evaluation and modalities, as well as any outcomes from the follow-up survey, such as an increase in the capacity of the certification course participants to conduct environmental health and land reuse activities.

The suggested time schedule for any collaborative publications or presentations may occur 12 -24 months after specific aspects of the courses are launched or evaluated.

Table A.16.1 – Project Time Schedule

|  |
| --- |
| Project Time Schedule |
| Activity | Time Schedule |
| Registration data summarized | 0.5 – 1 month after OMB approval |
| Additional information/data collection | 1—11 months after OMB approval |
| Analyses (evaluation) | 6—18 months after OMB approval |
| Publication | 12 - 24 months after OMB approval |

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

The display of the OMB expiration date is appropriate.

# A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification. These activities comply with the requirements in 5 CFR 1320.9.

# References

Berman, DeFlorio-Barker, & Whitehead, S. (2019, May). Local Health Agency Capacity to Engage in Environmental Health and Land Reuse and Redevelopment. *Journal of Environmental Health, 81(9)*, 36-39.

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Parker, E., Margolis, L. H., & Henrizuez-Roldan, C. (2003). Assessing the capacity of health departments to engage in community-based participatory public health. *American Journal of Public Health, 93(3)*, 472-476.

Rodriguez, H. P., McCullough, J., & Hsuan, C. (2014). Local health department collaborative capacity to improve population health. *Frontiers in public health services & systems research, 3(4)*, 7.

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United States Department of Labor. (2022, June 8). *Occupational Employment Statistics*. Retrieved from Bureau of Labor Statistics: https://www.bls.gov/oes/tables.htm

1. NEHA independently hosts its online/asynchronous 10-hour EHLR Basic course that contains the same content as the ATSDR classroom course. ATSDR is not seeking PRA clearance for the NEHA training. ATSDR is currently funding NEHA (through July 2023) to collaboratively pilot and finalize the course content of ATSDR’s new “EHLR Immersion Training.” [↑](#footnote-ref-2)