## **Response to Terms of Clearance**

## **Pregnancy Risk Assessment Monitoring System**

(OMB Control No. 0920-1273; Exp. date 03/31/2026) May 25, 2023

#### **Summary**

CDC received OMB approval for the Pregnancy Risk Assessment Monitoring System (PRAMS) on 3/31/2023. As part of the terms of clearance, the final cleared version of the cognitive testing for Phase 9 questions was to be provided to OMB within 60 days of approval.

## **Background and Justification**

The Pregnancy Risk Assessment Monitoring System (PRAMS) provides data that is not available from other sources. PRAMS is approved to collect information on maternal behaviors and experiences before, during and shortly after pregnancy on a variety of topics, including those related to the social context of childbearing. PRAMS is a key data source used by CDC, states, jurisdictions, and researchers to monitor prevalence of maternal behaviors and experiences, investigate emerging issues in the field of reproductive health and to assess impacts of programs and policies aimed at reducing health problems among mothers and babies.

#### **Cognitive Testing**

Cognitive testing for the Phase 9 core and optional standard questions were completed by the National Center for Health Statistics, Collaborating Center for Questionnaire Design Evaluation Research (OMB No. 0920-0222, expiration 9/30/24). The report on Phase 9 cognitive testing is described in **Attachment 17**. Cognitive testing was conducted to assess respondents' ability to understand standardized terminology and ensure the survey questions capture the scientific intent to ensure validity and appropriateness of proposed supplement. Cognitive testing methodology utilizes respondent narratives, which are collected using verbal probing techniques.

# Findings from Cognitive Testing

The findings of this study serve the dual purposes of both providing information about the constructs captured by the questions and about how patterns of interpretation may be related to socio-linguistic context.

Additionally, the study examined inconsistencies in the ways respondents interpreted and responded to the questions, uncovering possible sources of response error. The report provides question-by-question summaries of study findings and documents changes made to the questionnaire based on interim findings during data collection. Findings from this study may be used to assist question design and understandings of the survey data.

Also included is a letter responding to 30-day comments received from March of Dimes on CDC efforts to improve data quality, completeness, efficiency, and timeliness of PRAMS data. Mentioned in this response, and noted in terms of clearance, CDC will submit a further non-substantive change request to OMB upon the completion of its nonresponse bias analysis on the 2020 data, requesting approval for any changes in its data dissemination policy.