Change Request

DEPARTMENT OF HEALTH AND HUMAN SERVICES
Centers for Disease Control and Prevention

Pregnancy Risk Assessment Monitoring System (PRAMS)

(OMB Control No. 0920-1273, Expiration Date: 03/31/2026)

JUSTIFICATION MEMORANDUM FOR NON-SUBSTANTIVE CHANGE REQUEST

Summary

We request a non-substantive change to OMB control number 0920-1273 to 1) remove the current response threshold requirement so all jurisdiction data are available for release to internal and external researchers and 2) change release of PRAMS multi-jurisdiction data from previously documented proposal process to the PRAMS Automated Research File (ARF) process.

Attachments

- Attachment 19a: PRAMS Nonresponse Bias Assessment of 2020 and 2021 Data
- Supporting Statement A, clean and track changes
- Supporting Statement B, clean and track changes

Background and Justification

Background. In the last extension and revision request approved by OMB on March 30, 2023, PRAMS provided results of 2019 nonresponse bias analyses (previously submitted as Attachment 19) with the goal to inform the use of a response rate threshold as a criterion to release PRAMS jurisdiction data for use by researchers. Results of the 2019 nonresponse bias analyses suggested minimal bias in the data overall, by jurisdiction, and by indicators. OMB requested that these analyses be repeated for 2020 data.

Multi-jurisdictional PRAMS data has been provided to researchers (internal and external to CDC) through a proposal process which requires researchers to submit individual data proposal applications for approval by CDC and jurisdictions.

Justification. PRAMS has completed the addendum nonresponse bias analyses for 2020 and 2021 data. Results of the analysis are summarized **in Attachment 19a** titled, "PRAMS Non-Response Bias Assessment of 2020 and 2021 Data." The current report provides results from analyses of 2020 and 2021 PRAMS data. These results align with the previous 2019 results, suggesting little bias in the data overall and a modest relationship between bias and response rate. Based on our findings from 2019-2021 data, PRAMS is requesting to remove the current response threshold requirement and to release all

jurisdiction data that agree to participate in the ARF, regardless of the response rate achieved by jurisdiction.

The previous data proposal process for access to PRAMS data for analytical purposes could take 2-3 months from submission to approval. PRAMS implemented the PRAMS Automated Research File (ARF) process to release multi-jurisdictional data to researchers without a data proposal process. With this process, researchers can download PRAMS datasets from the PRAMS ARF web portal. The new ARF process makes it easier and faster for researchers to request and access PRAMS data (24-48 hours). With approval to remove the response rate threshold described above, data for the 2023 calendar year of births (first year of Phase 9) and subsequent years will be released without a response rate threshold. For selected previous calendar years of births (Phase 8 years 2016 to 2022), data for jurisdictions that had not been previously released based on a response rate threshold will be uploaded to the ARF.

Effect of Proposed Changes on Currently Approved Instruments

Form	Current Question/Item	Requested Change
SSA and SSB	N/A: Current change request does not affect approved instruments	(1) Remove response rate threshold requirement for data release. (2) Transition access of multi-jurisdictional PRAMS data from a proposal process to the ARF.

Effect on Burden Estimate

There are no changes to estimated burden for this information collection as no changes to data collection instruments and procedures are proposed. The table below documents the approved burden for the total information collection, which remains unchanged in this change request.

Form	Approved Burden	Requested Burden
SSA and SSB	31,268 hours	31,268 hours
Total	31,268 hours	31,268 hours