

**Generic Information Clearance for CDC/ATSDR
Formative Research and Tool Development
Customer Discovery Interviews with Five NIOSH Audiences**

Supporting Statement A

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Table of Contents

Justification

1. Circumstances Making the Collection of Information Necessary
2. Purpose and Use of the Information Collection
3. Use of Improved Information Technology and Burden Reduction
4. Efforts to Identify Duplication and Use of Similar Information
5. Impact on Small Businesses or Other Small Entities
6. Consequences of Collecting the Information Less Frequently
7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency
9. Explanation of Any Payment or Gift to Respondents
10. Protection of the Privacy and Confidentiality of Information Provided to Respondents
11. Institutional Review Board (IRB) and Justification for Sensitive Questions
12. Estimates of Annualized Burden Hours and Costs
13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers
14. Annualized Cost to the Federal Government
15. Explanation for Program Changes or Adjustments
16. Plans for Tabulation and Publication and Project Time Schedule
17. Reason(s) Display of OMB Expiration Date is Inappropriate
18. Exceptions to Certification for Paperwork Reduction Act Submissions

Attachments

- Att 1 — Authorizing Legislation
Att 2 — Interview Guide
Att 3 — Non-Research Determination

- **Goals of the project:** To collect preliminary information to set strategic direction and communicate research findings more effectively.
- **Intended use of the resulting data:** Results from interviews will be used to facilitate discussion within the three NIOSH research programs when refining current communications and products, such as providing useful resources to ensure that users have an effective, efficient, and satisfying experience with NIOSH programs.
- **Methods to be used to collect data:** Interviews
- **The specific subpopulation to be studied:** 1) volunteer firefighters, 2) home healthcare aides, 3) corrections officers, 4) mental health workers, and 4) state, county, and city health department employees.
- **How data will be analyzed:** Qualitative analysis will be performed to examine major topics mentioned by participants.

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

This information collection request is to conduct customer discovery interviews with five key audiences (referenced below) of the National Institute for Occupational Safety and Health (NIOSH), part of the Centers for Disease Control and Prevention (CDC). NIOSH is the federal institute responsible for conducting research and making recommendations for the prevention of work-related injury and illness.

In recent years, NIOSH has used business practices associated with Lean Start-up Methodology to provide staff with information about their audiences. An important part of Lean Start-up is a process called “customer discovery.” Businesses use customer discovery to understand customer wants and needs. Interviews are used to collect anecdotal attitudes, typically from 20 to 50 targeted people. The questions focus on the people’s tasks, the gains (positive aspects) available, the barriers they face, and the resources they rely on. Companies use this information to consider what types of products might be of value to their customers. The entire process is designed to gain important direction. It also prevents companies from committing funds, time, and effort into something that won’t be of value to customers.

At NIOSH we have found that customer discovery provides the information our programs need to operate effectively, to continue serving their current customers and reach new customers. Communication strategies in particular must be tailored to reach specific worker groups within an industry.

NIOSH proposes conducting 160 customer discovery interviews across five key audience groups:

1. **Volunteer firefighters** – Defined as active (not retired) volunteer firefighters working in rural areas. They can hold any position within their local firehouse.
2. **Home healthcare aides** – Defined as workers who travel to clients’ homes to provide medical or palliative assistance. They must hold some form of credential for their work (for example, CNA, LPN, RN).
3. **Corrections officers** – Defined as those who work in “custody” positions in jails or prisons, in direct contact with incarcerated populations.
4. **Mental health workers** – Defined as having specialized training or certification in the mental health field. This can include psychiatrists, counselors, and licensed therapists.
5. **State, county, and city health department employees** – Defined as working in a state, county, or city health department, but does not hold a leadership, upper-management, or administrative position.

Each audience group was selected by a NIOSH [research program](#) because we historically have had less engagement with these groups, and they are comparatively understudied. For example, NIOSH has conducted research and had many rich partnerships with career firefighters. However, 52% of firefighters are volunteers, and this is particularly prevalent in rural communities.¹ In addition, NIOSH research within these communities focuses on the safety and health factors related to their work. It does not tend to cover attitudes and values associated the people doing work in these fields.

¹ U.S. Fire Administration [2024]. National Fire Department Registry Quick Facts. Emmitsburg, MD: Federal Emergency Management Agency, U.S. Fire Administration, <https://apps.usfa.fema.gov/registry/summary>

Information of this sort is often collected by marketing departments, but it is generally proprietary and rarely focuses on occupation.

NIOSH has established a contract with The Voice of Your Customer, LLC to recruit participants, schedule interviews, and pay incentives. For the volunteer firefighter and corrections audiences, the contractor will also conduct the interviews. NIOSH staff will conduct the interviews for home healthcare aides, mental health workers, and health department employees.

This data collection is authorized under Section 20(a) (1) of the Occupational Safety and Health Act (29 U.S.C.669).

This is a request for approval of a genIC data collection under the currently approved GENERIC (0920-1154) for a period of two years.

2. Purpose and Use of the Information Collection

The audiences we reach will provide valuable insight for the corresponding NIOSH research programs. Volunteer firefighters and corrections officers are served under the [Public Safety Program](#). Home healthcare aids and mental health workers are served under the [Healthcare and Social Assistance Program](#). Finally, health department employees are served under the [Services Program](#).

The feedback will provide insights into customer perceptions, experiences, and expectations. Past customer discovery interviews have revealed that actual workplace dangers do not always line up with perceived threats. The things workers should—according to the data—care about are not necessarily the things they do care about. The customer discovery interviews will enable researchers and program leaders at NIOSH see the gap between perception and reality and produce strategies for closing it.

At NIOSH, this approach helps shine a light on promising avenues for future research and communications. It also helps use funds efficiently by giving early insight which strategies are likely to be successful and which are not. The ultimate goal is to focus NIOSH staff attention on areas where communication might improve delivery of products or services.

3. Use of Improved Information Technology and Burden Reduction

Participants have the option to hold the interviews on Zoom, which eliminates the burden of traveling to the interview site. Interviewers will use Zoom's "record audio only" feature if performed via video call in order to prevent recording a person's image (which is identifiable). While the interviewer and interviewee will be able to see each other, no video recording will be made, only audio. Interviews will last 30-60 minutes and transcripts will be generated from the audio recordings.

4. Efforts to Identify Duplication and Use of Similar Information

NIOSH conducted an environmental scan and determined that this audience information was not available from current sources. The audience and consumer research tools that CDC uses, MRI-Simmons Market Data and Porter Novelli Surveys, allow stratification by demographics like age and gender, but not specific occupational groups. Surveys also do not allow for the kind of exploratory data collection that an interview does.

Customer discovery interviews are standard in the business and marketing world. However, the information derived from these interviews is closely held by the companies performing it. Companies rarely share or publish this proprietary information. Additionally, it is rare for companies to focus their marketing efforts on the attitudes and values that are of concern to NIOSH programs: namely, workplaces, job tasks, on-the-job safety attitudes, and feelings about an industry, field, or occupation.

5. Impact on Small Businesses or Other Small Entities

Employers from small business or other small entities may be involved in these efforts but the contractor will minimize the burden on them during information collections by scheduling interview dates and times that work for participants, asking for readily available information, and using short, easy-to-complete information collection instruments. The burden on respondents has been reduced and minimized by the use of an efficient and effective interview guide. Through our previous customer discovery experiences, we have found that participants are willing to share their insights, and they do not find the half-hour interview format to be burdensome; however, the arrangements need to be convenient. Previously this included having interviewers travel to their work locations. With the mainstream adoption of video calls, interviewees have expressed a preference for this technology.

6. Consequences of Collecting the Information Less Frequently

This request is for a one-time data collection. There are no legal obstacles to reducing the burden. This formative research will aid in the understanding of the challenges and needs of five audiences related to occupational safety and health. Data will be used to facilitate discussion within three NIOSH research programs when refining current communications and products, such as providing useful resources to ensure that users have an effective, efficient, and satisfying experience with the NIOSH programs. This feedback will provide insights into customer or stakeholder perceptions, experiences and expectations, and focus attention on areas where communication might improve delivery of products or services.

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

There are no special circumstances with this information collection package. This request fully complies with the regulation 5 CFR 1320.5.

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

A Federal Register Notice was published for the generic information collection. The Federal Register notice was published for this collection on July 22, 2022, Vol. 87, No.140, pp. 438360. No public comments were received.

9. Explanation of Any Payment or Gift to Respondents

Because the interviews often cut into potential work time, especially for the self-employed or those in small businesses, we have found that a monetary expression of appreciation is highly valued. We have found through previous efforts that some workers are willing to talk for up to 10 minutes without any incentive. Most, however, are open to longer interviews held at scheduled times only with a small incentive. Through this project, we are seeking to interview more than 100 workers. We have found

through previous efforts that the cost of locating suitable interview subjects who are willing to share their time altruistically is more financially costly than providing a small token of gratitude for a worker's time and insight. For these reasons, NIOSH will provide a \$50 cash incentive to each interviewee.

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

ISSO determined in conjunction with the CDC Privacy Office that Privacy Act is not applicable. The collection contains PII with demographic information to recruit diverse participants (i.e., Race, Ethnicity and Gender).

During recruitment, the person will be asked for a job title and an industry, as well as duration in at the job and in the industry. The recruitment contractor is seeking to find a variety of people and will ask about people's sex and race. These demographics will be collected separately from the interview responses and will be tied to a participant ID.

Over the course of an interview, the interviewer will refer to the person by their first name only and will not ask for identifying details like names and places. No PII will be intentionally collected but the participant may volunteer such information. For example, participants will not be asked for the name of their workplace, but it may come up. Participants may also share information about home or work locations, work history, or education in response to questions. In order to de-identify the data, all personal identifying information will be removed when data from the interview is compiled, shared, and reported on outside of the contractor and NIOSH staff tied directly to the project. Names of all participants will be redacted, as will specifics about companies, locations, and other reasonable identifiers from all transcripts and reports.

Files generated by the proposed activity will include one interview guide (MS Word), along with interview and workshop transcripts (MS Word). These files will be saved to a Virtual Volume, as advised by the NIOSH Office of the Director for Information Technology (OD-IT). The Virtual Volume will be accessible to project personnel in the NIOSH Office of Communication and Research to Practice. The team overseeing this exercise will use the following measures to protect against inappropriate use or disclosure or malicious or accidental loss or destruction of information: (1) transcripts generated from interviews performed by Voice of Your Customer will be deidentified before they are transferred to NIOSH project officer (using secure file transfer protocols identified by OD-IT); (2) transcripts generated following NIOSH-led interviews will be produced on NIOSH computers within the CDC network; (3) deidentified transcripts will be saved in a secure Virtual Volume on a NIOSH network.

The contractor will collect limited PII in terms of name and contact information (e.g., personal phone number, email address) for recruitment and scheduling. NIOSH staff will not have access to PII. All contact information will be contained in a secure password-protected datafile accessible only to approved staff during the data collection process, stored separately and not linked to the data, and deleted upon data collection completion.

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

The project received a non-research determination by the NIOSH Associate Director for Science Office, so IRB is not required. However, ethical treatment of participants is still very important, so we will obtain informed consent prior to interviews, keep identifiers needed for incentive payment separate from interview data, and store all data in a secure virtual location.

There are no sensitive questions in the interviews. Participants are asked about (1) job-related duties, (2) gains, or positive aspects of their job, (3) challenges related to their job, (4) where they seek out resources, and if time permits, (5) attitudes about safety and health. They will not be asked to disclose their employer's name or to recall distressing events. A previous set of customer discovery interviews conducted under OMB 0920-1154 used the same questions, and multiple participants reported that they enjoyed sharing about their jobs.

12. Estimates of Burden Hours and Costs

(a) Estimated Costs

The total burden is 160 hours over two years. Each of the 160 respondents will participate in a single interview for no more than one hour.

Type of Respondents	Attachment Name	No. of Respondents	No. of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Volunteer firefighters (private sector)	Interview guide	26	1	1	26
Home healthcare aid (private sector)	Interview guide	36	1	1	36
Corrections officers (private sector)	Interview guide	26	1	1	26
Mental Health workers (private sector)	Interview guide	36	1	1	36
State, county, and city health dept employees (government)	Interview guide	36	1	1	36
TOTAL					160

(b) Cost to Respondents

The Bureau of Labor Statistics National Occupational Employment and Wage Estimates for May 2023 was used to generate the hourly rate for all occupations.

- For the **volunteer firefighters**, we used the median hourly wage for all occupations in the U.S., since these are volunteers with a variety of primary occupations.
- For the **corrections** audience, we used 33-3012 Correctional Officers and Jailers.
- For **home healthcare aides**, we used 31-1120 Home Health and Personal Care Aides.

- For **mental health workers**, we averaged the mean hourly wage for 21-1018 Substance Abuse, Behavioral Disorder, and Mental Health Counselors; 21-1013 Marriage and Family Therapists; and 29-1223 Psychiatrists.
- For state, county, and city **health department employees**, we used the average of the mean hourly wage for 21-1091 Health Education Specialists, 19-1041 Epidemiologists, and 29-1141 Registered Nurses.

Occupation	Hourly Rate	Burden hours	No. of Respondents	Total
Volunteer firefighters	\$23.11	1	26	\$600.86
Corrections	\$28.27	1	36	\$1,017.72
Home Healthcare	\$16.05	1	26	\$417.30
Mental health	\$61.82	1	36	\$2,225.52
State, county, and city health department employees	\$40.82	1	36	\$1,469.52
TOTAL				\$5,730.92

13. Estimates of Other Total Cost Burden to Respondents or Record Keepers

There are no other costs to respondents or record keepers. There will be no direct cost to the respondents other than their time to participate in the data collection activity.

14. Cost to the Government

The total cost to the government is \$130,000 over two years.

Expense Type	Expense Explanation	Two-year Costs (dollars)
Personnel Salary	CDC Project Officer (GS-12, 0.15 FTE)	\$30,000
Contract	Recruit participants, schedule interviews, and pay out incentives	\$100,000
	TOTAL COST TO THE GOVERNMENT	\$130,000

15. Explanation for Program Changes or Adjustments

This is a request for approval of a genIC data collection under the currently approved GENERIC (0920-1154) for a period of two years.

16. Plans for Tabulation and Publication and Project Time Schedule

The following schedule of deliverables is in the contract.

Audience	Deliverable	Due Date
Volunteer firefighters	Recruitment notice	Within 6 months of funding and OMB approval
	Interview transcripts (redacted for PII)	At least 1 month before end of period of performance
	Notice of completion of all interviews	At least 1 month before end of period of performance
	Interview summary	Before end of period of performance
Home healthcare aides	Recruitment notice	Within 6 months of funding and OMB approval
	Interview schedule	Within 1 year of funding and OMB approval
	Notice of completion of all interviews	At least 1 month before end of period of performance
Corrections officers	Recruitment notice	Within 1 year of funding and OMB approval
	Interview transcripts (redacted for PII)	At least 1 month before end of period of performance
	Notice of completion of all interviews	At least 1 month before end of period of performance
	Interview summary	Before end of period of performance
Mental health workers	Recruitment notice	Within 6 months of funding and OMB approval
	Interview schedule	Within 1 year of funding and OMB approval
	Notice of completion of all interviews	At least 1 month before end of period of performance
State, county, and city health department workers	Recruitment notice	Within 1 year of funding and OMB approval
	Interview schedule	Within 18 months of funding and OMB approval
	Notice of completion of all interviews	At least 1 month before end of period of performance

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

The display of the OMB expiration date is not inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.