

# **SUPPORTING STATEMENT**

## **Part A**

National Guideline Clearinghouse™ (NGC)  
National Quality Measures Clearinghouse™ (NQMC)

### **Version**

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Agency for Healthcare Research and Quality (AHRQ)

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## **A. Justification**

### **1. Circumstances that make the collection of information necessary**

The mission of the Agency for Healthcare Research and Quality (AHRQ) set out in its authorizing legislation, The Healthcare Research and Quality Act of 1999 is to enhance the quality, appropriateness, and effectiveness of health services, and access to such services, through the establishment of a broad base of scientific research and through the promotion of improvements in clinical and health systems practices, including the prevention of diseases and other health conditions. AHRQ shall promote health care quality improvement by conducting and supporting:

1. research that develops and presents scientific evidence regarding all aspects of health care; and
2. the synthesis and dissemination of available scientific evidence for use by patients, consumers, practitioners, providers, purchasers, policy makers, and educators; and
3. initiatives to advance private and public efforts to improve health care quality.

Also, AHRQ shall conduct and support research and evaluations, and support demonstration projects, with respect to (A) the delivery of health care in inner-city areas, and in rural areas (including frontier areas); and (B) health care for priority populations, which shall include (1) low-income groups, (2) minority groups, (3) women, (4) children, (5) the elderly, and (6) individuals with special health care needs, including individuals with disabilities and individuals who need chronic care or end-of-life health care.

The National Guideline Clearinghouse™ (NGC) and the National Quality Measures Clearinghouse™ (NQMC) are sponsored by the Agency for Healthcare Research and Quality (AHRQ), U.S. Department of Health and Human Services. NGC is an Internet-accessible relational database containing structured summaries of evidence-based clinical practice guidelines. NQMC is an Internet-accessible relational database containing structured abstracts of evidence-based quality measures. Both databases are used by clinicians, guideline or quality measure developers, health plans, hospitals and health systems, state and federal agencies, policymakers, researchers, and others to help inform decisions about patient care. NGC can be accessed via the Internet at <http://www.guideline.gov> and NQMC at [www.qualitymeasures.ahrq.gov](http://www.qualitymeasures.ahrq.gov).

Expert Commentaries and Recommended Readings are new features common to both NGC and NQMC. Expert Commentaries are authored by the NGC/NQMC Editorial Board and/or by other experts working in conjunction with the Editorial Board. Expert commentaries offer insights not obvious from the information provided by guideline and measure submitters and educate users on the nuances of guideline or measure development, adaptation, implementation and evaluation. See Attachment B for an example of an Expert Commentary that was published to both the NGC and NQMC Web sites. The Recommended Reading feature provides brief annotations of topical articles

from the published literature. Following publication of an Expert Commentary, NGC/NQMC received the following response from a user of the NQMC Web site through the general user inquiry mailbox, [info@qualitymeasures.ahrq.gov](mailto:info@qualitymeasures.ahrq.gov): “The article by Dr. Wachter invites comments - where would I put them?”

There is currently no formal mechanism in place for users to provide responses or comment upon Expert Commentaries or Recommended Readings. Providing such a mechanism serves AHRQ’s mission directly, as fostering dialogue on these issues helps disseminate available scientific evidence among diverse stakeholders and also can help develop, refine, and support efforts to improve health care quality.

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

ECRI Institute is the contractor for NGC/NQMC (AHRQ Contract No.HHSA290200710005). The purpose of this statement is to describe ECRI Institute’s plan to implement a mechanism for NGC/NQMC users to provide responses to Expert Commentaries and Recommended Readings published to the NGC/NQMC Web sites.

Specifically, users who wish to respond to a commentary or recommended article will be directed to a Web-based form, which may be used to submit a response (See Attachment C, Commentary Response Submission Form, developed for Expert Commentaries and Attachment E, Recommended Readings Response Submission Form, developed for Recommended Readings. Responses accepted for publication would be posted to the NGC and/or NQMC Web site(s) along with the submitter’s name, current position or occupation, organizational affiliation and disclosed potential conflicts of interest. No other information collected through the Response Submission Form (i.e., email or other address) would be published or made accessible to users of the NGC/NQMC Web sites. A submitter’s address is not required and would potentially be used for follow-up correspondences in cases where clarifying information is needed. The search features of the NGC/NQMC Web sites are limited to the contents of the guideline/measure summaries and cannot be used to find a response submitter’s personal identifying information.

Submitted responses to commentaries/recommended articles will be reviewed at a minimum by a senior member of the NGC or NQMC content development team, the NGC/NQMC Project Director, two members of the NGC/NQMC Editorial Board, and the AHRQ NGC/NQMC Project Officer. Criteria for publication of responses to commentaries include:

- relevance of response to the subject of the commentary/recommended article
- responses that provide a unique perspective to the commentary/recommended article
- responses that offer an alternative view than the commentary/recommended article
- responses that are clearly articulated
- responses that are neither excessively long or offensive and/or nonobjective

### ***3. Use of Improved Information Technology***

As web-only resources, NGC and NQMC communicate with their users via the respective accessible Web sites. Accordingly, a Web-based form will be developed to facilitate collection of responses to our Expert Commentaries/Recommended Readings. The use of an online submission form is the most timely and efficient manner in which to receive responses. Since NGC and NQMC are Web-based resources, no additional mechanisms, such as post or fax, are being considered.

### ***4. Efforts to Identify Duplication***

Expert Commentaries/Recommended Readings and Responses to Expert Commentaries/Recommended Readings are new features to NGC/NQMC. No other organizations in the U.S. public/private sector are maintaining a guidelines or quality measures clearinghouse. Therefore, the Expert Commentary/Recommended Reading features within NGC/NQMC are unique. No other agency or units within AHRQ would be expected to collect similar information.

### ***5. Involvement of Small Entities***

The Response Submission Form is intended for persons or organizations that are already spending time at the NGC/NQMC Web site(s) and have chosen to use the Web site(s). While we anticipate that participation within small entities will be included in the pool of respondents, we anticipate little or no impact on small business or other entities. The form is short and is completed on a voluntary basis. We do not expect that our data collection procedures will result in any significant additional burden for small entities. Rather the data collection efforts are designed to minimize burden on all respondents.

### ***6. Consequences if Information Collected Less Frequently***

Responses to Expert Commentaries/Recommended Readings will be submitted on a voluntary ad hoc basis. While individuals are welcome to submit multiple responses, each response is considered a one-time event.

### ***7. Special Circumstances***

This request is consistent with the general information collection guidelines of 5 CFR 1320.5(d)(2). No special circumstances apply.

### ***8. Federal Register Notice and Outside Consultations***

#### ***8.a. Federal Register Notice***

This request is made under AHRQ's existing generic information collection authorization, OMB No. 0935-0106, entitled, "Voluntary Customer Satisfaction Survey Generic Clearance for the Agency for Healthcare Research and Quality." Publication in the Federal Register is not required.

### **8.b. Outside Consultations**

The concept of allowing viewers of the NGC and NQMC Web sites to respond to Expert Commentaries/Recommended Readings and developing an online submission to facilitate submissions was vetted with the NGC/NQMC Core Editorial Board and with AHRQ. The consensus opinion is that online response to commentaries/recommended articles is a desirable feature that will stimulate and facilitate dialogue among the NGC/NQMC audience and authors of the Expert Commentaries/recommended articles. Attachment D provides brief biographical sketches for members of the NGC/NQMC Core Editorial Board.

### **9. Payments/Gifts to Respondents**

Response submitters will not be financially compensated for participating and participation is voluntary.

### **10. Assurance of Confidentiality**

Individuals and organizations will be assured of the confidentiality of their replies under Section 934(c) of the Public Health Service Act, 42 USC 299c-3(c). They will be told the purposes for which the information is collected and that, in accordance with this statute, any identifiable information about them will not be used or disclosed for any other purpose.

Individuals and organizations contacted will be further assured of the confidentiality of their replies under 42 U.S.C. 1306, and 20 CFR 401 and 4225 U.S.C.552a (Privacy Act of 1974). In instances where respondent identity is needed, the information collection will fully comply with all respects of the Privacy Act.

Information that can directly identify the respondent (e.g., name) will be collected. Specifically, the following personal identifying information will be collected (see also Attachment C, Response Form):

- First Name\*
- Last Name\*
- E-mail Address\*
- Address
- State/Province
- Zip Code/Postal Code
- Country
- Current Position or Occupation\*
- Organizational Affiliation\*

Note: Only items marked with an asterisk are required. No information about race/ethnicity will be collected. The Response to Expert Commentaries/Recommended Readings feature is voluntary and will follow a model similar to what is used in many medical journals to allow readers to write “Letters to the Editor” or “Rapid Responses” to articles published on the Internet. Such models typically include the author’s name,

occupation, and organizational affiliation, as well as potential conflicts of interest. This lends credibility to the responses and allows for dialogue among professionals.

Responses accepted for publication would be posted to the NGC and/or NQMC Web site(s) along with the submitter’s name, current position or occupation, organizational affiliation, and disclosed potential conflicts of interest. No other information collected through the Response Submission Form (i.e., email or other address) would be published or made accessible to users of the NGC/NQMC Web sites.

The search features of the NGC/NQMC Web sites are limited to the contents of the guideline/measure summaries and cannot be used to find a response submitter’s personal identifying information.

**11. Questions of a Sensitive Nature**

No sensitive data will be collected.

**12. Estimates of Annualized Burden Hours and Costs**

Exhibit 1 shows the estimated annual burden hours for the respondent's time to participate in this project. Both the expert commentaries and the recommended readings forms can be filled out in approximately 1 hour per respondent. The total annual burden is estimated at 20 hours.

Exhibit 2 shows the cost burden associated with the respondents' time to participate in the project. The annual cost burden is estimated at \$548.

**Exhibit 1. Estimated annualized burden hours**

Form Name	Number of Respondents	Number of responses per respondent	Hours per response	Total Burden hours
NGC/NQMC Response Submission Form (Expert Commentaries)	10	1	1	10
NGC/NQMC Response Submission Form (Recommended Readings)	10	1	1	10
<b>Total</b>	20	1	1	20

**Exhibit 2. Estimated annualized cost burden**

Form Name	Number of Respondents	Total Burden hours	Average Hourly Wage Rate*	Total Cost Burden
NGC/NQMC Response Submission Form (Expert Commentaries)	10	10	\$27.44	\$274
NGC/NQMC Response Submission Form (Recommended Readings)	10	10	\$27.44	\$274
<b>Total</b>	20	20	\$27.44	\$548

\*Based upon the mean of the average wages for “Healthcare practitioner and technical occupations,” National Compensation Survey: Occupational wages in the United States 2007, “U.S. Department of Labor, Bureau of Labor Statistics.”

### ***13. Estimates of Annualized Respondent Capital and Maintenance Costs***

There are no direct costs to respondents other than their time to participate.

Submitters would only be required to be able to access the Web. No additional expenses would be incurred by participants.

### ***14. Estimates of Annualized Cost to the Government***

Annualized cost to prepare comments for publication to the NGC and/or NQMC Web site/s is estimated at \$13,638; this does not include a one-time form-development (labor) cost of \$416. To estimate these costs we quantified labor hours (with indirect costs/award fee included); no ‘operational expenses’ needed to be included in these estimates.

### ***15. Changes in Hour Burden***

Response to Expert Commentaries and Responses to Recommended Readings are new features/new collection of information for NGC/NQMC.

### ***16. Time Schedule, Publication and Analysis Plans***

No analysis of collected information is planned.

### ***17. Exemption for Display of Expiration Date***

AHRQ does not seek this exemption.

## **B. Attachments**

Attachment A: AHRQ's Authorizing Legislation

Attachment B: Sample Expert Commentary

Attachment C: Expert Commentary Response Form

Attachment D: NGC/NQMC Core Editorial Board

Attachment E: Recommended Readings Response Form