
June 22, 2015

Julie Wise
Office of Management and Budget
725 17th Street, N.W.
Washington, DC 20503

Dear Julie Wise:

The Medicare Current Beneficiary Survey (MCBS) Questionnaire Testing and Methodological Research team (OMB No. 0938-1275, exp. 05/31/2018) plans to conduct a cognitive interviewing study to test questions on sexual and gender identity status (LGBT). We propose to start recruiting participants as soon as we receive OMB approval. Our contractor, NORC at the University of Chicago, has also submitted this protocol to the NORC Institutional Review Board for its approval. Our schedule calls for NORC to begin cognitive interviews in July 2015 so timely approval of this letter would be much appreciated.

Background Information about Cognitive Testing of Questionnaires

The methodological design of this proposed study is consistent with the design of typical cognitive testing research. As you know, the purpose of cognitive testing is to obtain information about the processes people use to answer survey questions as well as to identify any potential problems in the questions. The analysis will be qualitative.

Proposed project: MCBS Cognitive Interviewing Study in English and Spanish

It is important to the CMS Office of Enterprise Data and Analytics (OEDA) and the CMS Office of Minority Health (OMH) to understand correlates of health disparities, including among minority groups such as LGBT individuals. Given these priorities, the MCBS will benefit from cognitive interviewing to test measures of sexual identity and gender identity, and measure health care access, utilization, and outcomes. Based on review and analysis and discussions with CMS, NORC will be testing a single sexual identity question (similar to that approved by OMB for use by the National Center for Health Statistics (NCHS) on the National Health Interview Survey (NHIS)) and a two part gender identity question used on the California Health Interview Survey (CHIS) to the MCBS. The objectives of the cognitive interviews are to evaluate the LGBT survey items and refine them for use in the MCBS.

The testing procedure conforms to the cognitive interviewing techniques that have been described in the MCBS Questionnaire Testing and Methodological Research generic OMB clearance package (No. 0938-1275, exp. 05/31/2018).

We propose to conduct the cognitive testing in two phases. In the first phase, we will recruit up to 30 participants who are Medicare beneficiaries aged 18 and over, with roughly 20 of the interviews conducted with heterosexual individuals and 10 of the interviews conducted with LGBT individuals. At least 3 to 5 each of the interviews with each group will be conducted in Spanish. Following the completion of the 30 interviews, we will assess the results of the cognitive testing and, if needed, make changes to the cognitive interview protocol. We would conduct up to an additional 20 interviews with the revised testing protocol. Thus, we are requesting approval to conduct a maximum of 50 cognitive interviews to test these questions.

All cognitive testing materials will be translated into Spanish as soon as we receive clearance for the English materials. The materials are included in Attachments A through G and described below.

As NORC has done successfully with other studies similar in scope to this, recruitment will be carried out through senior centers, health clinics, community centers, organizations with LGBT focus/members, Craigslist, and through community networks. NORC staff will use personal and professional contacts to spread word about the interviews among acquaintances with older family members who may be eligible for the study. In addition, NORC staff will attempt to reach eligible participants in venues that host events for older adults, such as libraries and community centers; NORC will also try to obtain permission to recruit at senior living centers. Please note that family members of NORC staff are not eligible to participate in this study. The Recruitment Script, Recruitment Message, and Frequently Asked Questions are contained in Attachments A, B, and C. The Eligibility Screener Questionnaire to determine eligibility of interested participants is contained in Attachment D. Administration of the screener questionnaire is estimated at 5 minutes.

The cognitive interviews will be conducted in-person at NORC's Chicago offices with the individual participant and an interviewer for no more than 60 minutes. After participants have been briefed on the purpose of the study and the procedures that NORC routinely takes to protect human subjects, participants will be asked to read (or have read to them) and sign the Participant Consent Form contained in Attachment E. The interviews will be audio recorded to allow researchers to ensure the quality of their interview notes.

The interviewer will then ask the participant to confirm that he/she understands the information in the Participant Consent Form, and then state that we would like to record the interview. The recorder will be turned on once it is clear that the procedures are understood and agreed upon. The interviewer will then administer the Cognitive Interview Protocol contained in Attachment F.

The cognitive interview will be structured into two parts:

- The first portion of the interview will focus on testing the addition of the single NHIS identity question and the two-part gender identity question, which will be integrated into the demographics section of the MCBS survey. This will be administered via a paper-and-pencil instrument. This will take approximately 40 minutes.
- The remaining portion of the survey will contain an informal debriefing which will explore respondent's views of sexual and gender identity, including whether the questions are sensitive, and how comfortable the respondent is when talking to the interviewer about sexual

orientation measures. The debriefing will also seek to learn more about Medicare beneficiaries' familiarity with and understanding of transgender. This will take approximately 20 minutes.

Volunteers for this study will need to provide their own transportation to the training location. Study participants will receive the federal statistical agency standard incentive of \$40 (cash) for the one hour cognitive interview. This level was set by the federal statistical agencies to defer some of the expenses associated with traveling and other incidental expenses. We note that the \$40 may only partially defer the cost of travel from downtown and surrounding Chicago suburbs.

- a. By public transit (two trains and a taxi): approximately \$40 round trip.
- b. By taxi: approximately \$80 round trip
- c. By car: approximately \$23 round trip, using the government reimbursement rate of \$.575 for a 40 mile round trip average. Parking would be an additional \$40 per day.

NORC has conducted thousands of cognitive interviews in our Chicago offices and knows from experience that we will not be able to recruit a diverse group of participants if we cannot offer an incentive that includes deferring some of the travel expenses. Following completion of the interview, participants will each receive \$40 cash and will sign the Participant Receipt Form contained in Attachment G.

Audio recordings and paperwork from the interviews will be stored in secured locked cabinets at NORC's offices and will be destroyed in accordance with Disposition Authority N1-440-95-1, Item 5b.

In total, for this project, the maximum respondent burden will be 55 hours. A burden table for this project is shown below:

Projects	Number of Participants	Number of Responses/ Participant	Average hours per response	Response burden
Eligibility Screener Questionnaire - Medicare Beneficiaries	50	1	0.10	5
2) Cognitive Testing Interview - Medicare Beneficiaries	50	1	1.0	50

If you have any questions or would like to discuss this request, please do not hesitate to contact the CMS Project Contract Officer's Representative, William Long, at 410-786-7927 or by email at william.long@cms.hhs.gov.