

Federal Data Collection Comment Opportunity for AEA Members

Behavioral Risk Factor Surveillance System Centers for Disease Control and Prevention

Comments Due February 9, 2018

The Centers for Disease Control and Prevention (CDC) asks OMB to approve the Behavioral Risk Factor Surveillance System (BRFSS) for the period of 2018-2021. The BRFSS produces state-level information primarily on health risk behaviors, health conditions, and preventive health practices that are associated with chronic diseases, infectious diseases, and injury. Designed to meet the data needs of individual states and territories, the CDC sponsors the BRFSS information collection project under a cooperative agreement with states and territories.

BRFSS information collection is conducted annually. The CDC and BRFSS awardees produce a new set of state-specific BRFSS questionnaires each calendar year (i.e., 2018 BRFSS series, 2019 BRFSS series, etc.). Each state's annual questionnaire includes a common core for even-numbered years and a common core for odd-numbered years that is administered by all states, and standardized optional modules that may be fielded at the states' discretion.

AEA members are encouraged to:

- describe the value of the 2018-21 BRFSS for economic research;
- comment on the data collection instruments and methods; and
- suggest changes that would enhance data quality, value, and accessibility and lower respondent burden and federal cost.

Federal Register notice: January 8, 2018 (includes instructions for submitting comments)

- Information Collection Request (ICR) submitted by CDC to OMB, including:
 - o <u>BRFSS survey instruments</u>
 - Supporting Statement
- Due date for comments: February 9, 2018
- More information: Machell Town, Population Health Surveillance Branch Chief, 770-488-2533, mpt2@cdc.gov

Information on ICR Process:

 By law, each data collection carried out by a federal agency must be cleared by OMB. Through the Federal Register notice, CDC is announcing that it has submitted a

- request to OMB for clearance to conduct the 2018-21 BRFSS and offers the public a 30-day opportunity to submit comments to OMB.
- After the close of the 30-day comment period, OMB will make its decision.

Guidance to AEA Members on Preparing Comments:

- Can comment on any aspect of the proposed data collection. Possible topics, for instance, include needs, uses, methodology, design, cost, schedule, and consultation with data users.
- May frame comments on specific topics in any way, such as:
 - o assessments identifying what you do and do not like and support
 - o suggestions for how CDC might proceed in this or future collections
 - o requests for example, for a change in the design of the survey instrument, to be consulted in the future, to carry out research on an alternative approach
 - observations for example, implications of the sample size for statistical reliability
- May propose that OMB incorporate a request in its "terms of clearance." For instance, you could suggest as a term of clearance that CDC research the efficacy of an alternative set of questions and report back to OMB in a year on the results.

Additional AEA Resources:

- A Primer on How to Respond to Calls for Comment on Federal Data Collections
- After reviewing materials, you may provide your observations, critiques, and requests to AEAStat staff Andrew Reamer at <u>areamer@gwu.edu</u> and he will organize them into a draft letter for your review. Prof. Reamer is experienced in crafting comment letters for impact.