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Information Collection: NRC Request for Information Concerning Patient Release Practices

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Submitter Information

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General Comment

Response to Federal Register Notice announcing the NRCs intent to submit an information collection request to the Office of Management and Budget (OMB) for the NRCs Request for Information Concerning Patient Release Practices.

1. Is the proposed collection of information necessary for the NRC to properly perform its functions? Does the information have practical utility?

This information is absolutely necessary for the NRC to properly perform its function, and in my opinion the information will have significant practical utility.

2. Is the burden estimate accurate?

Yes.

3. Is there a way to enhance the quality, utility, and clarity of the information to be collected?

I have two comments and one question:

First, I would assume that the NRC will already have copies of the extensive literature published. However, I am always amazed that when I believe I have the entire literature in hand, there is always another article that I did not know about, and it almost always seems to turn out to be a useful article.

I would propose that the request for identification of pertinent articles be added to the request for

websites, forms, etc.

Second, I have not thought this through extensively, but just as you are assessing burden with this survey, I believe it would be valuable to try survey--and thereby assess--the burden of whatever instructions, forms, or other processes a facility is using. I am in this case not speaking of the burden on the patient but the burden of completing instruction forms that require individuals to enter various data. Again, I am not sure how to assess this, and although simplicity is not necessarily sacrosanct, it is important.

The question is other than the notice that will be in the Federal Registry, will there be and is the NRC permitted to notify stakeholders in various organizations such as Society of Nuclear Medicine and Molecular Imaging, Endocrine Society, American Thyroid Association, and/or Thyroid Cancer Survivors Associates, Inc. (ThyCa), who in turn can notify their associates?

4. How can the burden of the information collection be minimized, including the use of automated collection techniques or other forms of information technology?

There are many excellent tools in the market place for automated collection techniques. However, the one important mechanism that needs to be available to reduce the burden to the respondents is the electronic forwarding of documents. Unfortunately, I do not know that much about automated collection techniques to know which on-line software has that capability that allows easy attachment of documents to an e-survey tool. But this would be important to incorporate.