

The SunWise Program
ICR # 1904.03

February 5, 2021

U. S. Environmental Protection Agency
Office of Air and Radiation

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of Information Request

The title of this Information Collection Request (ICR) is The SunWise Program (ICR# 1904.03).

1(b) Short Characterization/Abstract

The SunWise Program was initiated in 1998 through a statutory mandate under Title IV of the Clean Air Act. The long term objective of the SunWise Program is to reduce the incidence of, and morbidity and mortality from, skin cancer, cataracts, and other UV-related health effects in the United States. Short term objectives include: 1) reducing the risk of childhood overexposure to the sun by changing the knowledge, attitudes, and behaviors of elementary school children and their care givers; and 2) improving the availability of accurate, timely, and useful UV data directly to schools and communities across the United States.

The SunWise Program builds on traditional health education practices through the use of existing curricula, learning standards, scientific strategies, and evaluation mechanisms. The Program is a collaborative effort of schools, communities, health professionals, educators, environmental organizations, meteorologists, local governments, federal agencies, and others. Participating schools sponsor classroom and school activities to raise children's awareness of stratospheric ozone depletion, UV radiation, and the largely preventable health risks from overexposure to the sun, as well as simple sun safety practices. All educators interested in participating in this partnership program are asked to register using an online form (www.epa.gov/sunwise/becoming.html and www.epa.gov/sunwise/becoming_partner.html) or a hard copy form distributed by EPA. EPA will use the information provided through this registration to maintain a database of participating schools and organizations and a mailing list for information distribution purposes. Participating schools and organizations receive a variety of materials, including a classroom "Tool Kit" of games, songs, puzzles, story books, videos, access to the internet UV intensity mapping/graphing tools, and more. The Tool Kit also includes sample sun safety policies and guidelines to help expand the sun safety message beyond the classroom.

Teachers who sign up for SunWise are asked to complete a survey at the end of program implementation. Results of these surveys are used to fine-tune existing SunWise materials and develop new ones that better meet our participants' needs. Randomly selected teachers are also asked to administer a brief survey to their students before and after program implementation. The results from the student surveys are used to evaluate program effectiveness and also help guide materials development. The surveys will be mailed out to Program participants once they

have registered. Survey responses are voluntary and anonymous.

Additionally, SunWise is developing an on-line interactive SunWise Sun Safety Certification Program. When it is up and running, the certification program will allow for students, adults, organizations, and employers to develop credentials on sun safety awareness and behaviors. In order to gauge the certification program's effectiveness, we will be collecting a small amount of information including the user's first initial and last name, type of user, length of time to complete the tutorial, percentage of individuals who start the tutorial that complete it, percentage of tutorial completed by each user, and the accuracy of individuals completing the tutorial. Users types include: informal educators (at camps; parks; recreation programs; museums; science and health education centers; sports organizations; lifeguards; childcare and after school programs; high schools, colleges and university staff and students working with youth; health and medical organizations, etc.), children in grades K-8, and teachers and other school staff. This project is still in development.

TERMS OF CLEARANCE:

On November 2, 2001, OMB approved ICR #1904.01 with Terms of Clearance. EPA has addressed OMB's terms in the following manner.

This collection is approved in part and disapproved in part. EPA is approved to collect registration information and to conduct the requested student survey and teacher survey. These portions of the collection are approved for two years, until November 2003. OMB understands that EPA no longer intends to collect information under the Parent Survey and the School Administrator Survey. These two surveys are not approved. OMB has adjusted the burden of the collection accordingly from EPA's request.

EPA Response: We will not be surveying parents or school administrators under this ICR renewal.

As discussed in Part B of the revised supporting statement, EPA plans to assess two sampling issues in Fall 2002 based on results from the first year of the student survey: (1) whether it is necessary to include in the sampling protocol an approach to stratify between warm and cool states, and (2) whether it is necessary to include an additional sampling stage to sample classrooms within a school that has been selected for participation. EPA should report to OMB its findings with regard to these issues before beginning the second year of sampling, and advise OMB whether it intends in the second year of the collection to (1) stratify between warm and cool states in the first stage of sampling,

EPA Response (sent to OMB on 8/29/02): We have conducted this analysis and found no differences between the students in the 37 cooler states versus the 13 warm states, as categorized by the UV Index values. We measured change in scores from pretest to posttests on children's knowledge of sun protection, attitudes toward the sun, and current sun protection practices and found minimal differences in the change. Therefore, with no differences between the two groups,

there would be no reason to stratify our findings.

and/or (2) add a sampling stage to sample classrooms within a selected school.

EPA Response (sent to OMB on 8/29/02): We analyzed the composition of registrants in the SunWise database by region of the country and the number of schools that contained more than one classroom. It appears that 75 percent of schools in warm and cool climates have no more than 1 classroom per school with negligible difference by region. There is little evidence of clustering or differences in clustering between regions of the country. If that were the case, we would have to account for this effect by performing tests of intraclass correlation.

OMB also notes that EPA must include the OMB number, expiration date, and Paperwork Reduction Act notice on the teacher survey before using that instrument to collect information.

EPA Response: All information is now included on the teacher survey. See attachment #3 for verification.

1. Need for Use of the Collection

2(a) Need/Authority For The Collection

This collection will be used for program material distribution and to determine program effectiveness and participant satisfaction. Educators will be asked to fill out a simple registration form, which we use to mail out the program materials and keep track of the Program's:

- geographic reach (Which states/regions have SunWise schools?);
- grade-level and subject-matter distribution (How many 1st grade teachers are using SunWise? How many math teachers are using SunWise? etc.); and
- student participation level (How many students is SunWise potentially reaching?).

Surveys to be administered include:

- Student survey to identify current sun safety knowledge and behaviors among students; and
- Teacher questionnaire for measuring their receptivity to the educational component of the Program.

The data will be analyzed and results will indicate the Program's effect on participants' sun-protection attitudes and behaviors. Responses to the collection of information are voluntary. All responses to the collection of information remain anonymous and confidential.

The SunWise Sun Safety Certification Program is voluntary and will remain anonymous and confidential. No contact or demographic information other than the user's last name and type

will be stored. By collecting the user's first initial and last name, it will allow the user to go back and complete the tutorial at a later date. This will help EPA determine which audiences are using the resource and if it is too difficult or too long, by answering these questions:

- \$ Who is using the certification program?
- \$ How long does the tutorial take?
- \$ Are users completing the tutorial?
- \$ How much of the tutorial are they completing? and
- \$ How well are users learning from the tutorial?

The SunWise School Program recognizes the challenge of measuring the progress and evaluating the effectiveness of an environmental and public health education program where the ultimate goal is to reduce risk and improve public health. Therefore, the continual and careful evaluation of program effectiveness through a variety of means, including data from pre- and post-intervention surveys, tracking and monitoring of classroom activities and school policies, and advisory board meetings, is necessary to monitor progress and refine the program.

2(b) Practical Utility/Users of the Data

EPA/SunWise will use the survey results to evaluate program effectiveness and adapt as appropriate its messages, approaches, and materials. Survey results will enable EPA/SunWise to better meet the needs of its teacher and student participants, with the long range goal of reducing the incidence and effects of skin cancer and other UV-related health problems among children and adults.

3. Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

The information required to complete the survey for The SunWise Program is not duplicative of information otherwise available to EPA. In the early stages of the SunWise Program's development in 1997, several searches for information were completed in consult with external stakeholders, including representatives from the following organizations:

- American Academy of Dermatology
- American Cancer Society
- Boston University Medical Center - Skin Oncology, Cancer Prevention & Control Center
- Centers for Disease Control and Prevention
- National Association of Physicians for the Environment
- National Safety Council
- The Skin Cancer Foundation

Results from these consultations indicated that no other formal, student-focused, sun safety

programs were being implemented in the United States, nor were surveys being conducted on attitudes and practices of children relating to sun exposure.

To EPA/SunWise's knowledge, there is no other sun safety certification available in the US, therefore it is essential that accurate information on the users and use of the certification program be collected for program refinement.

3(b) Public Notice Required Prior to ICR Submission to OMB

Official notice of this proposed collection appeared in the **Federal Register on Monday, February 12, 2007 (72 FR 6564)**. One comment was received. The individual requested that the information not be collected, but gave no justification for their claim. The comment was considered in this final ICR renewal.

3(c) Consultations

The following professionals were consulted during the development of the survey instruments:

- Alan Geller, Boston Medical Center, Skin Oncology Cancer Prevention & Control Center, (617) 638-7126
- Dave Buller, PhD, AMC Cancer Research Center, (303) 239-3511
- Dr. Barbara Gilchrest, Chair, Department of Dermatology, Boston University School of Medicine, (617) 638-5538
- Dr. Donald Miller, Assistant Professor of Epidemiology and Health Policy, Boston University School of Medicine, (781) 687-2865

3 (d) Effects of Less Frequent Collection

SunWise depends on registration information to:

- maintain an accurate list of participants; and
- ensure timely distribution of program materials and program updates to participants.

SunWise depends on survey responses to:

- help guide program development;
- measure participant satisfaction with the program; and
- elicit basic information on attitudes and practices of children and their caregivers relating to sun exposure.

SunWise depends on certification program information to:

- determine which tutorial to provide to the user;
- measure how many and what type of users are becoming certified;
- ensure the tutorial does not take too long to complete;
- ensure rigor and enthusiasm for the tutorial; and
- determine whether or not the tutorial is delivering the information in an easy-to-understand manner.

Conducting the surveys and information collection less frequently may slow down the Program's ability to institute participants' desired changes.

3(e) General Guidelines

All OMB guidelines will be adhered to by EPA/SunWise Program.

3(f) Confidentiality

Names of participating schools and organizations may be made public. All names of registered educators and other participating individuals will remain confidential. All responses to the collection of survey information will remain anonymous and confidential. A contractor will analyze survey results and, thereafter, return all completed surveys to EPA. For the certification program, users' first initial and last name will be confidential. EPA will make public how many informal educators, teachers and students have taken and completed the tutorial.

3(g) Sensitive Questions

The survey instruments of this ICR contain no sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondent/SIC and NAICS Codes

Entities potentially affected by this action are elementary and middle school students, and educators (SIC Div. I: Group 8211; NAICS code: 61111).

4(b) Information Requested

The registration form (Attachment 1) is a simple, 10-minute questionnaire that asks teachers to provide: the name and contact information of the participating school; school composition (e.g. grade levels); and information specific to the interest areas of the registering teacher. The purpose of this form is to ensure that EPA distributes the most relevant education materials to all SunWise participants.

The survey instruments covered under this ICR are as follows:

- **The SunWise Student Survey** (Attachment 2): This survey will be administered to participating students before and after implementation of SunWise activities. This simple, 10-minute questionnaire elicits basic information on attitudes and practices of children relating to sun exposure. (Please note that during discussions with OMB for the initial ICR approval, it was determined that an abbreviated burden statement would be appropriate for this survey group.)
- **Teacher Evaluation of Classroom Activities** (Attachment 3): Teachers will be asked to evaluate student receptivity to sun safety lessons and Internet learning. Teacher feedback about the usefulness of classroom and school materials will be vital to the refinement of sun safety education materials. This information can also be submitted online.
- **SunWise Sun Safety Certification Tutorial** (Under development; questions in Attachment 4): Certification program users will be asked to provide their first initial and last name so they can stop and return to complete the tutorial at their leisure, and their user type. The information will be used to pull up the correct tutorial and to print the certificate upon completion. The time to enter this information will be minimal at 1 minute.

Registration forms can be submitted electronically or in hard copy using postage-paid envelopes provided by EPA. Likewise, teachers are given postage-paid envelopes in which to return their completed surveys, along with the surveys returned to them by the students. The teacher survey is also available electronically. Neither the registration nor the surveys require that respondents keep records, make photocopies, or maintain files.

5. The Information Collected

5(a) Agency Activities

The Agency activities associated with registration of participants done through the SunWise Program consists of the following:

- Maintain participant database; and
- Maintain mailing list for information distribution purposes.

The Agency activities associated with surveying done through the SunWise Program consists of the following:

- Develop collection instruments;
- Answer respondent questions;
- Audit and/or review data submissions;
- Reformat and distribute the data; and
- Store the data.

The Agency activities associated with the certification program done through the SunWise Program consists of the following:

- Develop certification program/tutorial;
- Store and consolidate data;
- Review consolidated data; and
- Refine tutorial accordingly.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use electronic and hard-copy registration forms, mailed and electronic surveys, and electronic records of tutorial inputs. EPA will provide self-addressed, stamped envelopes to respondents.

EPA will ensure the accuracy and completeness of collected information by having all surveys reviewed by the contractor. An annual statistical report in consult with the contractor will be developed.

EPA plans to review the efficiency of using an electronic bulletin board or the Internet to facilitate the transfer of information between EPA and potential or active program participants.

EPA will not engage in statistical surveying. Respondents will be randomly selected from schools within all 50 states.

EPA plans to review data collected from the certification program/tutorial and make refinements to the program as necessary.

5(c) Small Entity Flexibility

Not applicable.

5(d) Collection Schedule

All educators are required to register for the Program if they wish to receive the Tool Kit (www.epa.gov/sunwise/becoming.html and www.epa.gov/sunwise/becoming_partner.html) and regular program updates. Student surveying is done using random sampling. The SunWise partner schools administer the student surveys two times each school year – once pre-program implementation and once post-program implementation at the teacher's discretion. The teacher surveys are administered once during the school year, and are done on a voluntary basis, thus all educators registered in SunWise have the opportunity to complete a survey. No specific completion dates are given to the respondents. Respondents are requested to submit the surveys during the school year in which they were administered. Data analysis will occur during the summer months, with result available to the public by October of each year. All educators and students are required to provide their first initial, last name and user type in order to take part in

the on-line certification tutorial. There is no collection schedule for registration or certificate program enrollment, as it is ongoing.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

EPA developed the SunWise Program Registration Form with the Agency's Internet Support Team in Research Triangle Park, North Carolina. Input from a five-person focus group was used to determine average completion time. Teachers are asked to complete the registration form only once during their participation in the program for a total registrant burden of 10 minutes.

Annual estimated respondent burden:

Annual Respondent Burden- Registration	
Registrant Group	Hour Burden
Educator	.17

During the development phase of the surveys, EPA, in consult with the contractor, conducted a pilot survey with no fewer than 20 respondents to determine appropriate content and survey completion time. The student survey will be administered two times per year. Each survey will take approximately 10 minutes to complete, for annual per student burden of 20 minutes. The teacher survey is administered one time each year and takes approximately 20 minutes to complete.

Annual estimated respondent burden:

Annual Respondent Burden- Surveys	
Survey Group	Hour Burden
Student	.33
Educator	.33

Users will only be asked to enter their first initial and last name and to choose a user type once during their participation in the tutorial for a total registrant burden of 1 minute.

Annual estimated respondent burden:

Annual Respondent Burden –Tutorial/Certificate	
Survey Group	Hour Burden
Student	.04
Educator	.04

6(b) Estimating Respondents Costs

The Bureau of Labor Statistics figures (<http://stats.bls.gov/news.release/ecec.t02.htm>) were used to determine labor costs for these tables. In order to account for benefits and overhead, the average hourly wage rate of \$36.67 for a teacher was increased by 110% for a labor cost of \$77.01 per hour for teachers.

Annual Respondent Burden and Cost- Registration			
Registrant Group	# of responses per participant	Hour Burden	Labor Cost
Educator	1	.17	.17 * \$77.01 = \$13.09

Annual Respondent Burden and Cost - Surveys			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Student	2	.33	2(.33 * 0) = 0
Educator	1	.33	.33 * \$77.01 = \$25.41

Annual Respondent Burden and Cost – Tutorial/Certificate			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Student	1	.04	2(.04 * 0) = 0
Educator	1	.04	.04 * \$77.01 = \$3.08

The respondents will have no capital/startup or O&M costs.

6(c) Estimating Agency Burden and Cost

Registration information collection is done primarily through a website database feature.

The start-up cost associated with designing the registration web page was approximately \$25,000. Operating and Maintenance (O&M) Costs associated with maintenance of the website are estimated to be 4 hours/month or 48 hours per year and will be conducted by in-house EPA employees. The cost of this labor is calculated based on a GS 12 Step 5 pay level (\$36.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6), making the total annual cost \$2,784.76. Finally, EPA will manually input all information received via hard-copy registration form onto the database. The costs of this labor are estimated to be 50 hours per year at a GS 5 Step 1 pay level (\$14.56/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (50) multiplied by \$25.73 per hour amounts to a total agency labor cost of \$1164.80 per annum.

Agency Burden and Costs - Registration		
	Burden Hours	Total Costs (\$)
EPA (Annual)	98	\$3,949.56
EPA (3-Year ICR)	294	\$11,848.68

The contractor assists EPA in data collection and analysis. The contractor also provided technical support in the development of the surveys. To perform these functions, EPA has contracted for a total of 850 professional hours. At an average rate of \$82.35 per hour, the total cost for the contractor is \$70,000 annually. Agency burden to manage this contract is estimated at 4 hours/month or 48 hours annually. The cost of this labor will be calculated based on a GS 12 Step 5 pay level (\$58.02/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (48) multiplied by \$58.02 per hour amounts to a total agency labor cost of \$2,784.96/per annum.

Agency Burden and Costs- Surveying		
	Burden Hours	Total Costs (\$)
EPA (Annual)	48	\$2,784.96
EPA (3-Year ICR)	144	\$8,354.88

The contractor will create and maintain the tutorial, including the data collection component. To perform this function, EPA has contracted for a total of 410 professional hours. At an average rate of \$130.00 per hour, the total cost for the contractor is \$53,300 for startup costs, and 100 hours per year at a cost of \$13,000, for maintenance each year after. Agency burden to manage this contract is estimated at 4 hours/month or 48 hours annually. The cost of this labor will be calculated based on a GS 12 Step 5 pay level (\$58.02/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (48) multiplied by \$58.02 per hour amounts to a total agency labor cost of \$2,784.96/per annum.

Agency Burden and Costs – Tutorial/Certification		
	Burden Hours	Total Costs (\$)
EPA (Annual)	48	\$2,784.96
EPA (3-Year ICR)	144	\$8,354.88

6(d) Estimating the Respondent Universe and Total Burden Costs

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
3,500 Educators	595	\$77.01	3,500	\$45,820.95
Total (Annual)	595		3,500	\$45,820.95
ICR Total (3 years)	1,785		10,500	\$137,462.85

(A) Number to be surveyed	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
1,500 Students	1,000	0	3,000	0
1,000 Educators	333	\$77.01	1,000	\$26,510.13
Total (Annual)	1,333		4,000	\$26,510.13
ICR Total (3 years)	3,999		12,000	\$79,530.39

(A) Number to Take Tutorial	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
100 Students	3.33	0	100	0
1000 Educators	33.33	\$77.01	1,000	\$2,566.74
Total (Annual)	36.66		1,100	\$2,566.74
ICR Total (3 years)	109.98		3,300	\$7,700.22

ICR Total- Registration + Surveys + Tutorial (annual)	1,964.66		8,600	\$74,897.82
ICR Total- Registration + Surveys + Tutorial (3 years)	5,893.98		25,800	\$224,693.46

6(e)Bottom Line Burden Hours and Cost Tables

Bottom Line Burden and Costs (3-Year ICR)		
	Burden Hours	Total Costs (\$)
Students	3,010	0
Educators	2,884	\$224,693.46
EPA	584	\$28,276.50
O&M Costs (EPA Contractor)	3,160	\$327,300.00
Total	9,638	\$580,269.96

6(f) Reasons for Change in Burden

We added hours for the new tutorial/certification program. Additionally, the number of educators registering per year has increased to 3,500 to correspond with PART goals. Combining that with inflation and changing contractors, the total burden has increased.

6(g) Burden Statement

The annual public reporting and record keeping burden for this collection of information is estimated to average 10 minutes per response for the registration, 20 minutes per response for the two surveys, and 2 minutes per response for the tutorial/certification program. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and

transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2007-0069, which is available for public viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2007-0069 and OMB control number 2060-0439 in any correspondence.