

Appendix C

**Summary of three Public Comments submitted in response to
publication of the 60-Day Federal Register Notice**

December 13, 2007 (Vol. 72, No. 239, pp. 70865-70866)

and CDC Responses to the Public Comments

Public Comment #1, 60Day-08-05CL
Federal Register Vol. 72, No. 239, pp. 70865-70866 (December 13, 2007)

-----Original Message-----

From: jean public [<mailto:jeanpublic@yahoo.com>]

Sent: Thursday, December 13, 2007 4:32 PM

To: OMB-Comments (CDC); AMERICANVOICES@MAIL.HOUSE.GOV;

COMMENTS@WHITEHOUSE.GOV

Cc: MEDIA@CAGW.ORG

Subject: public comment on federal register attached below in full

evaluation of children's view related to healthy food

this kind of spending of us tax dollars is completely wasteful and unnecessary at this time when the us is teetering on the brink of bankruptcy. this is not sound use of american tax dollars. we know enough to attack this on many different levels without this spending in sin city wshington dc so that bureaucrats can gather alot of paper and do nothing with it. this is not necessary. shut down this project at this time.

dont fund it. after all the money to keep illegal immigrants is in the budget and the work is not being funded so we know this administration in sin city doesnt enforce the laws or work they dont want to.

b. sachau

15 elm st

florham park nj07932

CDC Response to Public Comment #1

Thank you for your comments. CDC is committed to efforts aimed at reducing the rising levels of obesity, chronic disease, and preventable premature mortality in the U.S. We appreciate you expressing your concerns.

Public Comment #2, 60Day-08-05CL
Federal Register Vol. 72, No. 239, pp. 70865-70866 (December 13, 2007)

From: Densie Webb [mailto:dwebb@foodminds.com]
Sent: Tuesday, February 05, 2008 3:00 PM
To: OMB-Comments (CDC)
Subject: Formative Evaluation of Adult's and Children's Views Related to Promotion.....05CL

Could you please send me more information on the data collection and time line of the Formative Evaluation of Adults' and Children's Views Related to Promotion of Healthy Food Choices survey? Thank you for you help.

Densie Webb

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CDC Response to Public Comment #2

Thank you for your interest in our qualitative research project titled "Formative Evaluation of Adults' and Children's Views Related to Promotion of Healthy Food Choices." You requested the results of a survey, but actually this project is not a survey but rather a series of focus groups designed to obtain information about attitudes and beliefs around healthy food choices. We plan to conduct focus groups of children ages 9-12 and 5-8; focus groups of the parents of these children; and additional focus groups of parents of young children ages 2-4. Ultimately we hope to develop recommendations as to how to effectively market nutritious foods to children and parents. We plan to begin conducting focus groups in the late summer of 2008, or as soon as we obtain OMB approval. Please refer to the attached materials for additional information about the proposed project.

Thank you for your interest.

Attached: Draft Supporting Statement
Draft Moderators Guide for Children
Draft Moderators Guide for Parents

Public Comment #3, 60Day-08-05CL
Federal Register Vol. 72, No. 239, pp. 70865-70866 (December 13, 2007)

Comments of the Grocery Manufacturers Association

Department of Health and Human Services – Centers for Disease Control and Prevention
Request for Public Comment and Recommendations Regarding
Proposed Data Collections in connection with a Formative Evaluation of Adults' and
Children's Views Related to Promotion of Healthy Food Choices

[60 DAY-08-05CL]

The Grocery Manufacturers Association ("GMA") is pleased to provide these comments for the record in response to the Centers for Disease Control and Prevention's ("CDC") request for public comments regarding its proposed data collection in connection with the Congressional request for a formative evaluation of adults' and children's views related to the promotion of healthy foods choices.¹

In this Comment, GMA commends the CDC for undertaking this vital research and makes a few recommendations regarding the proposed research methods in order to improve the ambitious data collection process the CDC proposes to undertake. GMA supports both the promotion of healthy food choices for children and their parents and caretakers, as well as encouraging research into the most effective means of promoting these products. GMA has long supported the promotion of healthy foods to adults and children and the value of market research on the most effective means of promulgating these healthful messages.

GMA is the world's largest association of food, beverage, and consumer product companies. The \$2.1 trillion food, beverage and consumer packaged goods industry employs 14 million workers, and contributes over \$1 trillion in added value to the nation's economy. The association applies legal, scientific, and political expertise from its member companies to promote sound public policy, champions initiatives that increase productivity and growth, and helps to protect the safety and security of the food supply throughout the world. GMA is led by a Board of fifty-two member company chief executives. GMA speaks for food and consumer product manufacturers at the state, federal, and international levels on legislative and regulatory issues.

GMA members are committed to assisting the CDC in its efforts to study this important issue and believe there will be substantial value for all concerned by the CDC undertaking this review. In this spirit, the members offer suggestions on ways to enhance the quality, utility, and clarity of the information to be collected as well as commenting that it is probable that as long as the proposed focus groups are conducted in a targeted yet unbiased fashion the information gained will have unquestioned utility.

¹ See *Request for Public Comment*; 72 Fed. Reg. 70865 (Dec. 13, 2007).

Research

GMA recognizes the value of the CDC's proposed use of focus groups to measure and study the effectiveness of existing messages regarding healthy food choices. Focus groups are commonly used tools that can help give qualitative information about prospective marketing messages or historical programs. However, experts in the field of market research have recognized that focus groups do not provide data that allow quantitative assessments that are projectable to larger populations. Many experts use focus groups as a prelude to quantitative research. In general, for focus groups to produce useful information there are three important components: 1. the subjects; 2. the questions; and 3. the questioner. GMA will address each of these components in turn with respect to the proposed data gathering effort.

Focus Group Subjects

GMA appreciates that the CDC has chosen to make both children and their parents (and caregivers) the subjects of the proposed focus groups. GMA has long believed that one of the most important building blocks of healthy eating begins at home with parents leading their children by example and talking to their children about healthy eating and physical activity. It is for this reason that GMA members have actively participated in the Ad Council's Coalition for Healthy Children² – a coalition of nonprofit and for-profit companies that has a mission of providing clear, consistent, research based messages to children and parents on the importance of practicing a healthier lifestyle and offering those children and parents a means to accomplish this worthy goal.

Similarly, GMA has reached out to the gate-keepers for most of the food that reaches America's children – parents – through its development and participation in the "Take A Peak" initiative.³ This innovative program was designed to promote the United States Department of Agriculture's MyPyramid – the government's newly launched food guidance system. Realizing that it is parents that are the key consumers with respect to healthy eating by children, the program via clear and simple in-store messaging, provides consumers with easy-to-follow advice showing how small, progressive changes in purchasing habits and diets can improve health. The Take a Peak initiative was undertaken based on research that demonstrated consumers are eager for healthier foods – and for more information about how to choose these foods. With these experiences in mind, GMA supports the CDC's decision to use parents on the focus group panels.

Question Content

Market research data traditionally is greatly influenced by the questions asked and the relevancy of the samples presented to the study's participants. It is because of the importance of these

² See www.adcouncil.org/healthychildren/index.html.

³ See www.tapintomyramid.com/index.htm.

samples that GMA offers its assistance to the CDC in procuring up-to-date marketing materials that promote healthy food choices. Whether these materials be TV, print, radio, internet, packaging, or otherwise, GMA stands ready to work with its member companies to provide the most useful samples available to the CDC to use in the focus group settings so that the data accurately reflects the participants' opinions on materials currently in the marketplace. For example, many prominent GMA members are charter members of the Children's Food and Beverage Advertising Initiative ("CFBAI"), by which participating companies devote at least half of their advertising to children under 12 to promote healthier products and/or encourage good nutrition or active lifestyles. The advertising that has resulted from the initiative may be an excellent source of material for the CDC to use in its focus groups.

Further, because the content of the questions is so crucial GMA requests the opportunity to comment on a draft and/or final version of the "moderator guide" to provide feedback on ways of improving the guide for maximum effectiveness. Similarly, GMA strongly recommends that distinguished childhood development experts be involved with the writing of the questions to ensure the content remains directly focused on the examination of the characteristics of effective marketing of foods to children and their parents to promote healthy food choices. Distinguished academic researchers could bring the type of balance and big picture approach that only years in the field of childhood development and food intake can develop. Focus groups that employ a moderator guide that is exacting and neutral severely limit the possibility of unintended results colored by preconceived ideas of the topic being studied.

The Facilitator

A crucial factor in successful marketing studies is the ability to ensure that the study is being conducted correctly and uniformly. While GMA takes no position regarding the CDC's choice of the Academy for Educational Development (AED) for the contract - GMA would make the following recommendation regardless of the chosen contractor: the CDC should retain a group of experts independent of AED to observe the focus group sessions. GMA makes this recommendation based on the Association's general experience in this area. For marketing focus groups to be successful it is vital that they are uniform in their application and the best method to ensure such uniformity is via close observation of the facilitators contracted with to conduct the focus groups on behalf of the CDC. Further, such observation during the early phases of the project would allow for modifications to be made at CDC's request during the course of the project, rather than waiting until project is concluded.

Report

GMA believes it is in the best interest of all parties if the CDC writes the report based on the data obtained via the focus groups. The proposal does not make clear whether it will be the CDC or AED that will write the report that will eventually be presented to the appropriate committees of Congress. GMA believes the CDC, with the assistance of the independent experts it enlists to assist the observation of the focus groups, will be in the best position to objectively analyze the data that others have collected. No matter the author, GMA suggests that drafts of the report either be made available for public comment or that experts not directly involved in the focus

groups be allowed to weigh in on the meaning of the collected data to provide much needed context to the final report.

Pre-Existing Data

Finally, GMA recommends that in addition to the data collected under the auspices of the proposed study that a call goes out to other government agencies, academicians, and industry for relevant previous studies to be voluntarily shared with the CDC to assist in the collection of data in this important area of study. To cite a single example, the USDA Center for Nutrition and Promotion (CNPP) in the development of MyPyramid conducted extensive focus groups with adults specifically to test messaging around healthful eating. In addition, the department developed the “MyPyramid for Kids” targeted to children 8-11 years old. The CDC should inquire with USDA CNPP to determine if the focus groups that were held with children during the development of MyPyramid for Kids are available for use by the CDC in conjunction with the CDC’s data collection. Because USDA CNPP also used focus groups with both adults and children, GMA believes that consulting with USDA CNPP could be of significant utility for the CDC. To cite a future opportunity, USDA CNPP is partnering with some industry participants in the “Partnering with MyPyramid: The Corporate Challenge to Step Up and End Childhood Obesity.” Either the materials associated with this program – which does not launch officially until April 2008 – or the research upon which the program was based could prove of significant interest to the CDC in its data gathering effort. GMA recommends the CDC work to acquire enough outside data, such as the data associated with this joint industry-government effort, to compare with the new data it will collect to make its final report not only statistically sound but contextually relevant.

Conclusion

GMA hopes the information contained in this Comment will help the CDC as it undertakes this project and seeks to complete its report. Should the CDC find in the course of its study that the assistance of GMA would be helpful in any way, GMA would be glad to provide it.

Grocery Manufacturers Association
1350 I Street, NW, Suite 300
Washington, DC 20005

c/o Mr. Jason Levine, Kelley Drye Collier Shannon, 3050 K Street, NW, Washington,
DC 20007

Dear Mr. Levine:

Thank you for the comments related to our research project titled “Formative Evaluation of Parents’ and Children’s Views Related to Promotion of Healthy Food Choices,” which was announced in the *Federal Register* on December 13, 2007.

Your concerns regarding the limitations inherent in focus group research and the importance of rigorous and standardized methodology are well taken. Please be assured that CDC will ensure that this project is designed and implemented according to current, professional research standards so as to minimize bias and maximize the validity of the results. We appreciate your specific suggestions in this regard (i.e., having groups observed for consistency and uniformity of procedures; utilizing child development experts; review of findings by outside experts). Most, if not all, of these recommendations are characteristic of how CDC approaches focus group work and already included in our planning. In terms of your thoughts around message testing, please note that we will not be testing messages in this phase of our research. Testing of concepts or messages is anticipated at a later stage.

As requested, we are providing copies of the draft Supporting Statement, which describes the proposed project, as well as copies of the draft moderators' guides for the focus groups.

As indicated in the *Federal Register* notice, you may provide additional comments by contacting Maryam Daneshvar, CDC Acting Reports Clearance Officer, by telephone or via reply to the OMB-Comments (CDC) mailbox. We appreciate and welcome your offer to provide relevant qualitative or quantitative data with us. Any such information you wish to share should be sent to the attention of Ms. Daneshvar. Thank you for your interest and for taking the time to share your thoughts.

National Center for Chronic Disease Prevention and Health Promotion
Centers for Disease Control and Prevention

Attachments: Draft Supporting Statement
Draft Moderator's Guide for Children
Draft Moderator's Guide for Parents