

## **INFORMATION COLLECTION REQUEST**

Science to Practice: Developing and Testing a Marketing Strategy for Preventing Alcohol-related  
Problems in College Communities

Supporting Statement A

CENTERS FOR DISEASE CONTROL AND PREVENTION

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**Date:** June 16, 2010

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## LIST OF ATTACHMENTS

- ATTACHMENT 1: Section 301 of the Public Health Services Act (42 USC 241)
- ATTACHMENT 2: 60-Day FRN
- ATTACHMENT 3: Instrument: Focus Group Participant Confirmation Letter
- ATTACHMENT 4: Instrument: Focus Group Protocol
- ATTACHMENT 5: Instrument: Focus Group Question Schedule
- ATTACHMENT 6: Background information for use in drafting the *Safer Universities Program* Marketing Materials
- ATTACHMENT 7: PowerPoint Slides Describing the Evaluation of the *Safer Universities Program* for Use in Drafting the Program Marketing Materials
- ATTACHMENT 8: Documentation of Inapplicability of IRB Review

## **Justification**

### **A.1. Circumstances Making the Collection of Information Necessary**

On January 9, 2009, CDC received OMB approval for the generic concept of health marketing (Health Marketing, 0920-0798) to provide feedback on the development, implementation and satisfaction regarding public health services, products, communication campaigns and information.

Under Health Marketing, OMB has agreed to expedite review of proposals for data collections for survey/informative materials development and customer satisfaction surveys only. OMB will generally review such requests within ten business days.

#### Background

The Centers for Disease Control and Prevention (CDC) requests a **new** information collection request to conduct focus groups for a project entitled, “Science to Practice: Developing and Testing a Marketing Strategy for Preventing Alcohol-related Problems in College Communities.” Each year, 1,700 college students die and more than 1.4 million are injured in alcohol-related incidents. Additionally, about 25% of students reporting negative academic consequences due to alcohol. Despite the enormous public health burden of college-age alcohol misuse, there have been few rigorous evaluations of environmental strategies to address alcohol misuse in college settings; environmental strategies typically involve implementing and enforcing policies that change the environments that influence alcohol-related behavior and subsequent harm. Further, studies show that the typical lag time between identifying an effective interventions and obtaining widespread adoption can stretch to well over a decade. There is an urgent need to develop more efficient and timely strategies for moving effective science to widespread practice. This project will address this exact issue by systematically developing a marketing strategy for a comprehensive, community-based environmental prevention program with proven efficacy in reducing intoxication and alcohol-impaired driving among college students.

The *Safer California Universities Project* was designed, implemented, and evaluated by the Pacific Institute for Research and Evaluation (PIRE) with funding from the National Institute for Alcohol Abuse and Alcoholism (NIAAA). This comprehensive community-based program focuses on the first weeks of the academic year and comprises several alcohol control measures (enforcement of underage sales laws; roadside DUI operations; social host party patrols with local ordinances) along with a multi-faceted media advocacy campaign via channels unique to college student audiences. The program was implemented among campuses in the two California university systems (UC and CSU) and proved efficacious in reducing intoxication and alcohol-impaired driving among college students.

PIRE, on behalf of CDC, proposes to develop and test a marketing strategy that addresses the variety of barriers and challenges that colleges and universities may face as they consider adopting a program based on the *Safer California Universities Project*. The proposed project is broadly based on work by the CDC (Sogolow, Sleet, Saul, 2007), the NIH and health communication theorists such as Maibach and Bloodgood, (2006) who argue persuasively on behalf of using a marketing approach to move an evidence-based strategy to adoption by a wide

audience. The project is responsive to NCIPC's research priority to "Evaluate strategies to implement and disseminate known, effective interventions to reduce alcohol-impaired driving and test the effectiveness of new, innovative strategies."

The proposed project will be conducted in 5 phases, each phase building on the activities conducted in the previous phase. Phase 1 will be to conduct focus groups that will identify the key features of the program to be developed and to help refine the audiences that will determine the likelihood of adopting the materials. Phase 2 will develop draft marketing materials and marketing plan based on the results of the focus group sessions. Phase 3 will continue focus groups to test how the marketing materials are received by target audiences. Phase 4 will execute the marketing plan with a national sample of 4-year colleges and universities. Phase 5 will follow up that marketing effort with a survey of key informants from the sampled institutions. Approval for Phases 2-5 will be submitted as a Change Request. This Information Collection Request (ICR), which is for approval of the focus group data collection described in phase 1, is being submitted under Section 301 of the Public Health Service Act (42 U.S.C.241) authorized on December 31, 2004, and copied into Attachment 1.

#### Privacy Impact Assessment

The CDC Privacy Act Officer determined that the Privacy Act is not applicable on February 13, 2009. Although personal information (e.g., name, business phone number, business mailing address, business email address) will be gathered for PIRE by their subcontractor, the Silver Gate Group, during recruitment for the focus groups, no personal identifiers (e.g., home address or phone number, social security number, etc.) will be collected or maintained. PIRE does have a website, <http://www.pire.org>, however none of the information collected for this research project will included on the website. PIRE has education and prevention programs designed specifically for children in school, <http://www.pire.org/topiclist2.asp?cms=232>, however the information and programs are not directed at children under the age of thirteen years. The Silver Gate Group has a website, <http://www.silvergategroup.com/index.htm> and does not have any information or pages directed at children under the age of thirteen years.

#### Overview of the Data Collection System

Working in collaboration with PIRE staff, the Silver Gate Group will recruit focus group participants from professional conferences. The Silver Gate Group will obtain participant lists from conference organizers and will contact potential focus group participants via email. The email will inform potential respondents about the project, the purpose of the focus groups, where the focus group will be held, and the incentive that will be provided. Potential respondents will also be informed that participation is completely voluntary and that all information provided is confidential. Email recipients will be asked to reply to the email if they are interested in participating in the focus group. One week before the scheduled conference, participants will receive a reminder email about the scheduled focus group. In order to ensure that approximately 12 participants show up for the focus group, a total of 18 people will be scheduled for each focus group.

The following conferences have been identified:

- International Association of Campus Law Enforcement Administrators
  - June 17-20, 2011 in Charlotte, NC
  - June 16-19, 2012 in Reno, NV
  
- National Conference on Law and Higher Education (Stetson Law)
  - February 5-8, 2011 in Orlando, FL
  
- NASPA (Student Affairs Administrators in Higher Education) – Annual Conference
  - March 12-16, 2011 in Philadelphia, PA
  - March 10-14, 2012 in Phoenix, AZ
  - March 16-20, 2013 in Orlando, FL
  
- American College Personnel Association Annual Conference
  - March 26-30, 2011 Baltimore, MD
  - March 24-28, 2012 Louisville, KY

In order to gain insight on the perspectives of different campus and community stakeholders who have the ability to influence public policy and allocate resources, the Silver Gate Group will recruit specific individuals to participate in focus groups. The stakeholder groups include upper-level administrators such as vice-presidents; campus and municipal police; student affairs; judicial affairs; student health; and community leaders. The Silver Gate Group will work with conference and meeting organizers to identify registered participants to form a pool of potential focus group participants. For example, to gain insight into the perspectives of campus law enforcement, they will work with the International Association of Campus Law Enforcement Administrators to obtain an advance list of participants at its annual meeting. Two weeks before the meeting they will email invitations to 18 potential focus group members to organize a focus group of up to 12 participants. They will assure that focus groups are not scheduled in conflict with the conference agenda or activities. As an incentive to participation we will provide light snacks (coffee, orange juice in the morning; soda, water in the afternoon), which also helps people relax and open up.

The first few focus groups will begin with general discussion highlighting the context within which any prevention program would be considered for adoption, followed by a description of the *Safer California Universities Project*, hereafter referred to as the *Safer Universities Project*, and questions dealing specifically with issues that might arise in its adoption. Participants will be asked about their interest in adopting and implementing the strategies and whether they have resources needed to do it. Information collected in these focus groups will be drawn upon in designing the draft marketing materials for the *Safer Universities Project*.

Key questions will include the following:

- Which department, if any, is specifically designated to pursue alcohol prevention programs?
- What is the university's perspective on the magnitude of alcohol problems in general, and those arising in private settings off-campus in particular?
- What influences the adoption of any new prevention program or strategy?
- What issues would arise in considering the adoption of the *Safer Universities Project*?
- What kind of evidence of effectiveness would most influence adoption?
- What other factors (apart from research evidence) would influence adoption?
- What barriers or objections would be raised?
- Which department on campus would be the one most likely to house this intervention?
- What would be the most compelling case that could be made for adopting the *Safer Universities Project*?

The later focus groups will be provided an overview of the *Safer Universities Project* and presented with the newly-developed marketing materials. Participants will be asked to react to the materials and will be asked about their impressions of how these materials may be received by target audiences.

Data from the focus groups will be retained until the end of the study, although contact information (in a separate file) will be deleted within a week after each focus group is conducted. No other personal information will be collected from focus group participants, as the intention is to get their professional judgment concerning the intervention, the organizational environment of universities, and their general perspectives and attitudes as they relate to the *Safer Universities Project*.

Items of Information to be Collected

PIRE will collect information in identifiable form. The information collected consists of:

- Participant Name
- Business Mailing Address
- Business Phone Number
- Email Address
- Other: Professional Title or Position
- Other: Name of Organization or Interest Group the Participant Represents

PIRE will not share the participant names, mailing addresses, phone numbers, or email addresses with CDC. In order to characterize the composition of the focus groups, a list of professional titles or positions and the names of organizations and interest groups that were represented will be shared with CDC. Information in identifiable form will not be maintained and will not pass through any database or website. Information will not be collected in a way that could be used to indirectly identify any of the focus group participants. Gender, race, and date of birth information will not be collected or maintained either by the contractor or CDC.

### Identification of Website(s) and Website Content Directed at Children Under 13 Years of Age

The focus group interviews will not involve any websites or website content directed at children under the age of 13. Focus group participants will not be involved in or directed to any website content or sites.

Authorization to conduct this study is contained in the Public Health Service Act (42 USC 241) Section 301. A copy of the legislation is included in the attachments. (Attachment 1)

### **A.2. Purpose and Use of the Information**

The overall objective of the focus group interviews is to 1) understand how best to customize the promotional materials to appeal to the different campus and community stakeholders who may lead the project; 2) understand how best to customize the program materials to meet the needs of these various stakeholders; and 3) test target audience's reaction to the *Safer Universities Project* marketing materials. The focus groups will be designed to isolate the perspectives of different campus and community stakeholders (e.g., upper-level administrators such as vice-presidents; campus and municipal police; student affairs; judicial affairs; student health; community leaders).

CDC will use the information gathered from the focus groups to: 1) identify types of various campus and community stakeholders that are qualified to lead implementation of the *Safer Universities Project*; 2) develop and revise customized marketing and program materials targeting these various potential campus and community stakeholders; and 3) inform strategies for the marketing plan.

Without clearance to conduct the focus groups described above, the resulting marketing plan would likely inadequately address perspectives and concerns of some of the audiences. Such limitations in the marketing plan could greatly reduce its effectiveness in persuading colleges and communities to implement the *Safer Universities Project*.

### Privacy Impact Assessment Information

There is no sensitive information being collected and the proposed data collection will have little or no effect on the invited participant's or focus group participant's privacy.

### **A.3. Use of Improved Information Technology and Burden Reduction**

Because the focus groups will be conducted in person, there will be no automated, electronic, or technological data collection techniques. The Silver Gate Group staff member will be responsible for recording written notes of the group discussion. These notes will be retained until the end of the study. Participants will not be identified by name on any session documents.

### **A.4. Efforts to Identify Duplication and Use of Similar Information**

This study does not duplicate a U.S. study. There has been no study or data collection effort to determine the perspectives of different campus and community stakeholders with respect to the



variety of barriers and challenges that colleges and universities may face as they consider adopting the *Safer Universities Project* to reduce alcohol-related problems in their community.

#### **A.5. Impact on Small Businesses or Other Small Entities**

One target audience of the focus groups will be community leaders. Community leaders will likely comprise a mix of participants from both small and large sized organizations and businesses. The burden on community leaders representing small businesses or other small entities will be minimal. Focus group participation is not expected to require more than a few hours and all information needed will be collected during the focus group.

#### **A.6. Consequences of Collecting the Information Less Frequently**

This item is not applicable to the proposed studies as the CDC is planning a single-time collection of information. All respondents in the focus groups will be asked to provide information only once for this particular study.

There is an urgent need to develop more efficient and timely strategies for moving effective science to widespread practice. These focus groups will identify specific barriers and challenges that will be transferable in the development of appropriate marketing materials for many college communities across the U.S. This work is essential toward meeting the goal of reducing intoxication and alcohol-impaired driving among college students.

There are no legal obstacles to reduce the burden.

#### **A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

This data collection request fully complies with Guidelines of 5 CF 1320.5. No special circumstances exist outside the guidelines

#### **A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency**

The 60-day Federal Register Notice (FRN) for 0920-0798 was published in the Federal Register on May 14, 2008, Vol. 73, No. 94, pp. 27833-27834. The 30-day FRN was published on July 24, 2008, Vol. 73, No. 143, pp. 43241-43242. No public comments were received. (Attachment 2)

#### **A.9. Explanation of Any Payment or Gift to Respondents**

Focus group participants may be provided remuneration for parking and/or where appropriate, a free meal or snack scheduled around the time of the data collection. It is standard practice in commercial market research to offer recruited respondents some form of remuneration for the time spent engaged in a data collection activity. Incentives are provided to ensure that potential focus group participants will not be excluded due to burden such as transportation and fuel costs,

lost wages and other barriers. Market research literature suggests that small monetary incentives have a strong positive effect on the response rate and no known adverse effect on reliability.

#### **A.10. Assurance of Confidentiality Provided to Respondents**

This submission has been reviewed by ICRO, who determined the Privacy Act does not apply. Although personal information (e.g., name, business phone number, business mailing address, business email address) will be gathered by the contractor during recruitment for the focus groups, no personal identifiers (e.g., home address or phone number, social security number, etc.) will be collected or maintained. Although the contractor will use identifiable information for purposes of scheduling the focus groups and inviting participants, the identifiable information will be kept in a separate database from the focus group data. Data from the focus groups will be retained until the end of the study, although contact information (in a separate file) will be deleted within a week after each focus group is conducted. The contractor will not share the participant names, mailing addresses, phone numbers, or email addresses with CDC. In order to characterize the composition of the focus groups, a list of professional titles or positions and the names of organizations and interest groups that were represented will be shared with CDC.

Although this data collection does not require IRB review and approval, study procedures are consistent with conventional ethical practices for collecting data from human participants (See Attachment 8 for inapplicability of IRB review). Respondents will be advised of the nature of the activity, the length of time it will require, and that participation is purely voluntary. Respondents will be assured that they will not incur any penalties if they choose not to participate in an interview or survey, or not to respond to any specific questions (including probes). Respondents will be informed that their responses will be treated in a secure manner and that any project results that are released by CDC will be reported in aggregate formats that do not identify individual respondents. Information describing the provisions for safeguarding privacy will be provided verbally and in writing on the Focus Group Participant Confirmation Letter (Attachment 3).

#### **A.11. Justification for Sensitive Questions**

Focus groups participants will be invited from campus and community sectors most likely to have influence regarding program adoption. Demographics about the campus or community sector are the only sensitive questions that are anticipated. (Attachment 4)

## A.12. Estimates of Annualized Burden Hours and Costs

This single-time data collection involves conducting focus groups.

### Estimates of Annualized Burden Hours and Costs

The respondents targeted for the proposed focus groups are upper-level administrators such as vice-presidents; campus and municipal police; student affairs; judicial affairs; student health; and community leaders. A total of up to ten focus groups with a maximum of 12 participants per focus group are anticipated. A maximum of 120 respondents will participate in the focus groups. The amount of time required for a respondent to take part in a focus group is estimated to be 2 hours. We estimate a total maximum of 240 burden hours.

The total estimated annualized cost is \$8680.00. Our calculations were made based on the average hourly wage rates presented in Table A.12. Source: Bureau of Labor Statistics, U.S. Department of Labor, May 2008 [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)

The total burden hours annualized in the table below have been rounded up to the next whole number.

### A.12. Estimated Annualized Burden Hours and Costs

Type of Respondent	Form	Number of Respondents	Number of Responses per Respondent	Average Burden per Respondent (in hours)	Total Burden Hours
College Administrator	Focus Group	60	1	2	120
Police Officer	Focus Group	20	1	2	40
Community Leader	Focus Group	40	1	2	80

### Estimated Annualized Burden Costs

Type of Respondent	Total Burden Hours	Number of Respondents	Hourly Wage Rate	Total Burden Hours	Total Respondent Cost
College Administrator	2	60	\$47.00	120	\$5,640.00
Police Officer	2	20	\$28.00	40	\$1,120.00
Community Leader	2	40	\$24.00	80	\$1,920.00

### A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no costs to respondents, other than their time for participating in data collection.

### A.14. Annualized Cost to the Federal Government

The one-time cost for the focus groups includes instrument design and implementation, data collection, data analysis and reporting. Instrument design, data analysis and reporting will be implemented by PIRE and overseen by CDC. Data collection will be accomplished via focus groups conducted by the Silver Gate Group and overseen by PIRE and the CDC technical monitor. The focus groups will be conducted over 8 months. Costs to the government include the costs of the contractor, the CDC Technical Monitor and the CDC Project Officer, both of whom will oversee the contractor's efforts. The estimated costs reflect the costs outlined in the contractor's budget and 48 hours of a CDC FTE (average Grade 13/15) for oversight of the data collection. The costs are as follows:

**Table A.14.A. Annualized Cost (one-time data collection using focus groups)**

	<b>Hours</b>	<b>Hourly rate</b>	<b>Cost at hourly rate</b>	<b>Other costs</b>	<b>Total</b>
Silver Gate Group	550	\$71.44	\$39,292	\$3,426	\$42,718
PIRE Project Director	120	\$84.15	\$10,098	\$6,221	\$16,319
PIRE Research Associate	35	\$25.00	\$875	\$0	\$875
PIRE Program Director	35	\$45.85	\$1,605	\$0	\$1,605
CDC FTE	48	\$55	\$2640	N/A	N/A
<b>Total</b>	<b>788</b>		<b>\$54,510</b>	<b>\$9,647</b>	<b>\$61,517</b>

### A.15. Explanation for Program Changes or Adjustments

This is a new data collection.

### A.16. Plans for Tabulation and Publication and Project Time Schedule

#### A.16-1 Project Time Schedule

This information collection includes qualitative analyses through thematic analysis. As no quantitative data will be collected, no complex analytic techniques will be used.

Results of the focus groups will be used to develop customized marketing and program materials targeting various potential campus and community stakeholders and inform strategies for the *Safer Universities Project* marketing plan. The results may be presented at conferences, and/or shared with other health professionals as appropriate. The project schedule is as follows:

**Table A.16.A. Project Schedule**

<i>Activity/Deliverable</i>	<i>Target Date</i>
Begin recruitment for focus groups	4 weeks after OMB approval
Conduct focus groups	10-35 weeks after OMB approval
Summary report of focus groups to CDC	40 weeks after OMB approval

CDC is requesting OMB Approval until January 2011.

**A.17. Reason(s) Display of OMB Expiration Date is Inappropriate**

The CDC intends to display the OMB approval expiration date and the information collection control number.

**A.18. Exceptions to Certification for Paperwork Reduction Act Submissions**

The CDC intends to meet all certification requirements and is, therefore, not seeking exception to any part of the Certification for Paperwork Reduction Act Submission.

References

Maibach EW, Van Duyn MAS, Bloodgood B. A marketing perspective on disseminating evidence-based approaches to disease prevention and health promotion. *Prev Chronic Dis* [serial online] 2006 Jul [4 Feb 2009]. Available from: URL: [http://www.cdc.gov/pcd/issues/2006/jul/05\\_0154.htm](http://www.cdc.gov/pcd/issues/2006/jul/05_0154.htm).

Sogolow, E S, Sleet, DA, Saul, J. Dissemination, implementation and widespread use of injury prevention interventions. In Doll L, Bonzo S, Mercy J, Sleet D (Eds). *Handbook of injury and violence prevention*. New York: Springer, 2007. p. 493-510.