

**OMB Clearance Justification**

**for**

**MyPyramid Tracker Information Collection for**

**Registration, Login, and**

**Food Intake and Physical Activity Assessment Information**

**OMB No.: 0584-0535**

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**A. JUSTIFICATION**

**1. Explain the circumstances that make the collection of information necessary.**

**a. Delegated Authority and Mission of the Center for Nutrition Policy and Promotion**

The U.S. Department of Agriculture (USDA), Center for Nutrition Policy and Promotion (CNPP) supports and promotes the health of all Americans by producing and promoting up-to-date science-based dietary guidance, including the Dietary Guidelines for Americans 2005 and the USDA's MyPyramid Food Guidance System. The Dietary Guidelines for Americans 2005 are the cornerstone of Federal nutrition policy for the general public, and they provide sound scientific advice for healthy Americans age 2 years and older about food choices that promote health and may prevent disease. CNPP has among its major functions the development and coordination of nutrition policy within USDA and the investigation of techniques for effective nutrition communication. Under Subtitle D of the National Agriculture Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3171-3175), the Secretary of Agriculture is required to develop and implement a national food and human nutrition research and extension program, including the development of techniques to assist consumers in selecting food that supplies a nutritionally adequate diet. Pursuant to 7 CFR 2.19(a)(3), the Secretary of Agriculture has delegated authority to CNPP for, among other things, developing materials to aid the public in selecting food for good nutrition; coordinating nutrition education promotion and professional education projects with the Department; and consulting with the Federal and State agencies, the Congress, universities, and other public and private organizations and the general public

regarding food consumption and dietary adequacy. The authority delegated to CNPP is presented in Appendix A.

**b. Justification for Data Collection**

The Center for Nutrition Policy and Promotion (CNPP) has two interactive tools, MyPyramid Menu Planner and MyPyramid Tracker, to provide consumers with personalized nutrition and physical activity assessments based on the current Dietary Guidelines for Americans. A user can create an account with a unique ID and password that will track personal dietary and physical activity information. Diet and physical activity history are stored on a server hosted by USDA and can be retrieved by the user for future review. As technologies change and improve, enhancements will be made to the online tools. Formative and usability testing will be performed on future enhancements to evaluate web site functionality prior to its release to the public.

**2. Indicate how, by whom and for what purpose the information is to be used.**

MyPyramid Menu Planner and MyPyramid Tracker are tools that can assist the public in making diet and physical activity choices. Users voluntarily go to the MyPyramid.gov web site to submit information. The information obtained from users is stored in a user account, which is maintained by USDA information technology (IT) staff. Only persons responsible for system maintenance, such as USDA information technology staff, will have access to user account information when necessary. Neither CNPP nor FNS have access to user account information, including dietary or physical activity data created by the user. CNPP and FNS will not in any way use the data acquired, stored or generated by the user. CNPP may,

however, use aggregated zip code data in the future to make system improvements or feedback voluntarily provided by users for marketing and promotion purposes.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques.**

All data collection is 100 percent electronic at <http://www.mypyramidtracker.gov>.

The electronic transmission automatically stores an individual's user ID and password as well as food consumption, physical activity and assessment results.

**4. Describe efforts to identify duplication.**

There is no duplication involved in this process of collecting data. CNPP solely administers the MyPyramid initiatives. There are similar data collections, however; they do not meet our needs.

**5. Impact on small businesses or other small entities.**

No data are collected from small businesses or other small entities. To our knowledge, individuals and households are the primary users.

**6. Describe the consequences to Federal program of policy activities if the collection is not conducted or is collected less frequently.**

The Dietary Guidelines for Americans 2005 is the cornerstone of Federal nutrition policy for the general public. The MyPyramid Food Guidance System is based on the Dietary Guidelines and provides sound scientific advice for healthy Americans age 2 years and older. If the information is not collected, users will not be able to assess individual food intake and physical activity status. Users

voluntarily enter information into the system. Therefore the frequency of the data collection is determined by the user. Inability to collect this information will diminish the public's ability to obtain personal diet and physical activity assessments based on the Dietary Guidelines for Americans and diminish the agency contribution to obesity and disease prevention initiatives.

**7. Explain any circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**8. Provide a copy and identify the date and page number of publication in the Federal Register of the agency notice.**

The 60-day notice for the "MyPyramid Interactive Tools Information Collection for Registration, Login, and Food Intake and Physical Activity Assessment Information" was published on Thursday, January 22, 2009 on page 3981-3983 of the Federal Register, Volume 74, No. 13.

**a. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data and frequency of collection.**

The Federal Register Notice was published and was available for comment to the public for a period of 60 days. One comment was received and is available in Appendix D. CNPP did not take this comment into consideration. Our response is included in Appendix E.

**b. Consultation with representatives of those from whom information is to be obtained.**

MyPyramid illustrates USDA's research-based food guidance system that translates nutrient recommendations into food intake recommendations. The MyPyramid and the related tools is a practical application of the current Dietary Guidelines for Americans. The *Dietary Guidelines* are mandated by Congress and issued jointly by [USDA](#) and the U.S. Department of Health and Human Services ([HHS](#)) at 5-year intervals, based on the recommendations of a non-Federal expert committee. They provide authoritative advice for people two years and older about how good dietary habits can promote health and reduce risk for major chronic diseases.

**9. Explain any decision to provide any payment of gift to respondents.**

No payment or gift to respondents is being provided.

**10. Describe any assurance of confidentiality provided to respondents.**

The home page of the web site describes its purpose and provides contact information. The website information collected is voluntary in nature and does not



collect or retain personal identifiable information. No individual's name or response will be identified." (Appendix B)

**11. Provide additional justification for any questions of a sensitive nature.**

This information collection does not involve questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

**a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

The total number of respondents for this collection is expected to be 3,310,722 for one time registration, login, and food intake and physical activity information. An estimated 22,173 respondents will track their food intake and physical activity information for one year. Approximately 10% repeatedly used the Tracker on a daily basis over the past year. This would equate to approximately 22,173 repeat users visiting the site each month during one year. Of the 3,310,722 total respondent population and based on MyPyramid Menu Planner activity, 650,000\* respondents have registered, logged on and entered food and physical activity data for at least one day for the same period. Approximately 10% used the Tracker on a daily basis over the past year. This would equate to approximately 5,420 repeat users visiting the site each month during one year. Future formative testing for both the MyPyramid Tracker and the Menu Planner will include an estimated 9 college students who will log-in, enter and track 3 days worth of food intake and physical activity information. Response times for both the MyPyramid Tracker and the Menu Planner include approximately 1 minute (.0167 hours) to register for a system log-on ID and password. It typically takes users 30 seconds (.0083

hours) to login to the systems and approximately 30 minutes (.5 hours) to complete food and physical activity data entry logs for 1 day. (See Appendix F for the burden estimates breakdown.)

\*The number of respondents has been established through MyPyramid.gov activity from January to December 2008.

**b. Provide estimates of annualized cost to respondents for the hour burden for collections of information.**

Previous estimates for this information collection reflect the average hourly wage as determined by the National Compensation Survey Report: Occupational Wages in the United States (August 2005) published by the U. S. Department of Labor, Bureau of Labor Statistics. The annual cost to respondents was previously determined to be \$37,679,751.50 (2,082,905 hours x \$18.09). This annual cost is based on an average wage which represents a wide range of potential user capabilities. The MyPyramid Interactive Tools are easy-to-use tools that can be successfully used by those at a limited literacy skills. Therefore, the cost to respondents should be revised to reflect a more appropriate wage. Effective July 2009, the minimum wage will be \$7.25 per hour. The revised annual cost to respondents for this information collection is \$49,614,984 based on the increased burden hours and hourly minimum wage (6,843,446 hours x \$7.25). See <http://www.dol.gov/esa/whd/minimumwage.htm>.

**13. Provide an estimate of the total annual cost burden to respondent of record keepers resulting from the collection of information.**

There is no capital/startup or ongoing operation/maintenance costs associated with this information collection.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated annualized cost to the Federal government is approximately \$420,000. This estimate is based on the following:

Annual server hosting and maintenance cost:	\$350,000
One Federal employee (GS13-1, \$31.25/hour) .75 FTE:	\$80,000
<hr/>	
Subtotal:	\$420,000

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a revision of a currently approved collection. To continue to provide access to the diet and physical activity online assessment tools and account for adjustment due to the increase in respondent usage, CNPP is requesting an additional 3,064,729 hours.

**16. For collection of information whose results will be published, outline plans for tabulation, and publication.**

There are no plans for statistical analyses in publications.

- 17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be appropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

- 18. Explain each exception to the certification statement identified in Item 19.**

There are no exceptions to the certification statement being requested.