

SUPPORTING STATEMENT JUSTIFICATION FOR BE FOOD SAFE CAMPAIGN PILOT SURVEY

1. Circumstances Making Collection Of Information Necessary:

This is a request for a new information collection addressing paperwork requirements related to the Be Food Safe campaign pilot surveys.

The Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary as provided in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.), the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.), and the Egg Products Inspection Act (EPIA) (21 U.S.C. 1031 et seq.). These statutes mandate that FSIS protect the public by verifying that meat and poultry products are safe, wholesome, unadulterated, and properly labeled and packaged.

FSIS has established the Be Food Safe campaign to educate consumers about the importance of safe food handling and how to reduce the risks associated with foodborne illness. As a part of the Be Food Safe campaign, the Agency plans to purchase advertising in Oklahoma City mass media outlets to promote safe food handling messages to consumers and to measure consumer awareness and response. The Oklahoma City, Oklahoma, media pilot will test the four Be Food Safe campaign safe food handling messages—Clean, Separate, Cook, and Chill. The campaign will be targeted at women, aged 25 to 49, who are caregivers for children under the age of 10 or for older adults. These women have been identified as the target audience because they are the individuals who are most likely to be preparing food for themselves and others, and who have an incentive to listen to food safety messages and adopt or change their behaviors as a result. During the campaign, advertising will be purchased in newspapers and on local TV and radio stations with the goal of communicating the message to and inspiring behavior change in the target audience.

2. How, By Whom and Purpose Information Is To Be Used:

The following is a discussion of the required information collection and recordkeeping activities.

As a part of the pilot effort, FSIS plans to conduct an evaluation of the campaign's effectiveness. Before launching the campaign, 400 randomly-selected women in the target audience will complete a 10

minute pre-test telephone survey. The pre-test survey will assess attitudes, beliefs, and behavior pertaining to food handling and food safety, media habits, and demographic and personal information (annual household income, education level, and ethnic origin). Approximately three to four weeks after the pre-test survey and immediately following the airing of the campaign, the post-test survey will be conducted with a second unique sample of 400 women. (FSIS expects that there will be about 172 non-respondents to each survey, i.e., women who are contacted but chose not to participate in the survey.) The post-test survey will assess awareness of and reactions to the campaign and its food safety messages, as well as gauge respondents' association of the campaign with USDA, and it will also inventory respondents' attitudes, intentions, and behaviors related to food safety (i.e., clean, separate, cook, and chill).

The data collected in these surveys will allow FSIS to examine what knowledge members of the target audience had about food safety before the campaign, whether they were aware of the campaign and, if they were, whether they changed any food preparation behaviors as a result. The information collected will be used to refine the campaign's messages, materials, and approaches in order to improve its overall effectiveness. Addressing any issues identified during the evaluation of the pilot campaign will help ensure that a planned, nation-wide Be Food Safe campaign is successful in promoting behavior among the general population.

There are 87.5 total burden hours for the information collection request relating to the Be Food Safe Campaign Pilot Survey.

3. Use Of Improved Information Technology:

The surveys will be conducted by telephone.

4. Efforts To Identify Duplication:

No FSIS office, USDA agency, or any other Government agency requires information relating to the Be Food Safe Campaign Pilot Survey. There is no available information that can be used or modified.

5. Methods To Minimize Burden On Small Business Entities:

Only consumers will be surveyed.

6. Consequences If Information Were Collected Less Frequently:

To conduct the information collections less frequently would reduce the effectiveness of the survey.

7. Circumstances That Would Cause The Information Collection To Be Conducted In A Manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

All information collection and recordkeeping activities in this submission are consistent with the guidelines in 5 CFR 1320.6.

8. Consultation With Persons Outside The Agency:

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice (74 FR 28213; June 15, 2009) requesting comments regarding this information collection request. The Agency received 3

comments. One comment from a trade association supports conducting the survey and requests that FSIS shares the findings of the survey with industry and food safety educators. Another comment said to put tax dollars into enforcement and not the survey. One comment said that the initiative was a distraction and a waste of resources and should be canceled.

The consultant that is working with the Agency on the survey interviewed three people to get their input on the clarity of the survey questions and on the time it takes to complete the survey (Abby Friedman; 240-747-4735).

National Agricultural Statistics Service has reviewed a copy of the information collection package, including the survey.

9. Payment or Gifts to Respondents:

Respondents will not receive any gifts or payments.

10. Confidentiality Provided To Respondents:

No assurances other than routine protection provided under the Freedom of Information Act have been provided to respondents.

11. Questions Of A Sensitive Nature:

The applicants are not asked to furnish any information of a sensitive nature.

12. Estimate of Burden

The total burden estimate for the reporting and recordkeeping requirements associated with this information collection is 144.8 hours.

400 consumers will participate in the pre-campaign pilot survey and 400 consumers will participate in the post-campaign survey for a total of 800 responses and 133.3 hours. Approximately 171 consumers will choose not to participate in the pre-campaign pilot survey and approximately 171 consumers will choose not to participate in the post-campaign pilot survey for a total of 344 responses and 11.5 hours. The total for the campaign pilot surveys is 800 respondents and responses and 87.5 burden hours

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Type of Respondent	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Respondents	456	1	456	10	76
Non-respondents	344	1	344	2	11.5
Total	800	1	800	7.59	87.5

The Agency estimates that 800 consumers will respond one time taking each consumer an average of 7.59 minutes to participate in the pilot survey for a total of 800 responses and 87.5 burden hours.

The cost to the respondents is estimated at \$1,050—this figure estimates potential wages missed by participating in the survey. The Agency estimates that it will cost respondents \$12 an hour in loss of potential salary by participating in the surveys. Respondents will spend a total of 87.5 hours and \$1,050.

13. Capital and Start-up Cost and Subsequent Maintenance

There are no capital and start-up costs and subsequent maintenance burdens.

14. Annual Cost To Federal Government:

The cost to the Federal Government for these information collection requirements is \$55,000. The costs arise from the pilot data collection and analysis.

15. Reasons For Changes In Burden:

There is a new information collection resulting in a program change of 87.5 burden hours.

16. Tabulation, Analyses And Publication Plans:

There are no plans to publish the data for statistical use.

17. OMB Approval Number Display:

FSIS will display the OMB approval number on any instructions it publishes relating to recordkeeping activities.

18. Exceptions to the Certification:

There are no exceptions to the certification. This information collection accords with the certification in item 19 of the OMB 83-I.