

Response to OMB Notice of Action
Terms of Clearance from 12/8/2009
OMB No. 0584-0524

FNS ensures that the formative research conducted under this clearance does not duplicate work conducted elsewhere in FNS or CNPP. Furthermore, FNS consults with program stakeholders and CNPP to ensure that individual members of the public are not burdened by participating in multiple collections. FNS uses screening measures when conducting random sampling to ensure that individuals are not involved in multiple studies within designated periods of time.

Formative research is specific to FNS programs in that it directly involves the development of messages and materials for program providers and individuals eligible for or participating in FNS programs. Formative research performed by FNS is used specifically in support of FNS nutrition assistance programs. Current generic clearance collections include:

- State and local User Response Feedback and Request Forms (FNS 804-5, 807-9, 811-13)
- Individual Response, Feedback, and Request Forms (FNS 804, 805 & 810)
- FNS Core Nutrition Messages and Supporting Content Testing
- Food Stamp National Media Campaign Audience Assessment of Messages and Outreach Materials
- HUSSC-TN 2009 (FNS-779, FNS-780, & FNS-781)
- OSIPO (FNS-790, FNS-791, FNS-792, & FNS-793)
- USDA FOODS PROGRAM

Materials produced by FNS as a result of the formative research is shared with and used by FNS as well as staff of State and local agencies and participants. The purpose of the formative research is to assist in the development of relevant, useful and appropriate materials and messages for the FNS/target populations. Screening of individuals among the public has been and will continue to be performed by the individual testing facility to determine whether or not individuals have recently participated in focus groups or interviews. If individuals have participated within the last 6 months, the conversation

will be terminated and the potential participant will not be considered for this particular round of testing.

Generic Clearance to Conduct Formative Research

**OMB CLEARANCE PACKAGE
0584-0524**

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C. Appendices - **Appendix 1: Approved Forms**

- **OSIPO Forms-FNS-790, FNS-791, FNS-792, FNS-793**
- **HUSSC Forms-FNS-779, FNS-780, & FNS-781**
- **SA/LA Feedback Forms (FNS-803-5, 807-9 & 811-13)**
- **Individual Feedback Forms (FNS 804, 805 & 810)**

Appendix 2: Response to Public Comment

Appendix 3: Legal Authority

- **Child Nutrition Act of 1966, (42u.s.c. 1787)**
- **Section 5 Richard B. Russell National School Lunch Act (42u.s.c 1754)**
- **Section II Food & Nutrition Act of 2008 (7 USC 2020)**

Supporting Statement for Paperwork Reduction Act Submissions

A. Justification

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

This is an extension of a currently approved data collection. This information collection is based on Section 19 of the Child Nutrition Act of 1966 (42 U.S.C. 1787) Section 5 of the Richard B. Russell National School Lunch Act (42 U.S.C. 1754) and Section 11(f) of the Food and Nutrition Act of 2008 (7U.S.C.2020). This request for approval of information collection is necessary to obtain input into the development of nutrition education interventions for population groups served by the U.S. Department of Agriculture, Food and Nutrition Service (USDA-FNS).

Diet has a significant impact on the health of citizens and is linked to four leading causes of disease, which can reduce the quality of life and cause premature death. While these diet-related problems affect all Americans, they have a greater impact on the disadvantaged populations served by many FNS programs. One of FNS' goals includes improving the nutrition of children and low-income families by providing access to program benefits and nutrition education. The FNS programs include SNAP, formerly known as Food Stamp Program (FSP), Child Nutrition, Food Distribution, and Supplemental Foods Programs.

The basis of our approach rests on the philosophies that all health communications and social marketing activities must be science-based, theoretically grounded, audience-

driven, and results-oriented. Secondly, consumer-based health communications require a focus on specific target audiences, encouraging positive behaviors in culturally relevant ways, unique benefits and supports for adopting the new behavior, insights into the most appropriate time and place to deliver messages, and striking the right tone to enhance attention and action to the message. Interventions need to be designed so that they can be delivered through different types of media and in a variety of formats for diverse audiences.

FNS develops a variety of resources to support nutrition education and promotion activities. These resources are designed to convey science-based, behavior-focused nutrition messages about healthy eating and physical activity to children and adults eligible to participate in FNS nutrition assistance programs and to motivate them to consume more healthful foods as defined by the Dietary Guidelines for Americans (DGAs). This includes education materials, messages, promotion tools and interventions for the diverse population served by the federal nutrition programs including WIC, SNAP Team Nutrition, Food Distribution and other programs.

Formative research activities authorized under the current approval include:
Insert list of items seeking renewal:

- State and local User Response Feedback and Request Forms (FNS-803-5, 807-9 & 811-13)
- Individual Response, Feedback, and Request Forms (FNS 804-5 & 810)
- FNS Core Nutrition Messages and Supporting Content Testing
- HUSSC-TN 2009 (FNS-779, FNS-780, & FNS-781)
- OSIPO (790, FNS-791, FNS-792, FNS-793)
- USDA FOODS PROGRAM

Future activities will support program specific projects such as social marketing initiatives, outreach and awareness efforts - such as the Ad Council's campaigns and

other nutrition education and promotion activities, food safety education and activities necessary to update current resources.

Formative research methods and information collection will include multiple approaches such as focus groups, interviews (dyad, triad, telephone, etc.), surveys and web-based information gathering tools. In accordance with OMB guidance regarding this generic clearance, we will provide individual memos explaining the exact methods of information collection as well as copies of the tools or instruments for gathering the data with each clearance package.

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

The information collected by FNS or its contractor will provide formative input and feedback on how best to reach and motivate the FNS target population. The data obtained will provide input regarding the potential use of materials and products during both the developmental and testing stages. In order to determine future nutrition education and outreach needs, tools and dissemination strategies, key informant interviews will be conducted. This task involves collecting a diverse array of information from a variety of groups including perspectives from people familiar with: the target audiences; the objectives of nutrition education and outreach interventions and projects; program constraints at State and local levels; and related issues. Expert opinions from program constituencies, researchers, and practitioners will be collected through interviews, surveys and other methods. FNS will also collect information regarding effective nutrition education and outreach initiatives being implemented by State agencies that administer nutrition assistance programs to address critical nutrition and program access issues. The information is not nationally representative and no attempt will be made to generalize the findings to be nationally representative or statistically valid.

Fundamental to FNS' success in delivering science-based nutrition messages and reaching diverse and low literacy segments of the population is obtaining qualitative feedback from key components of the target audience on the communication strategies and interventions that will be developed. This formative research is essential to

advancing FNS nutrition education and outreach efforts. The formative input and testing methods described in this request will assist in the development of more effective tools and communication strategies. Collection of this information will increase FNS' ability to formulate nutrition education and outreach interventions that resonate with the target population of low-income American families, who have the highest need and can derive the most benefit.

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

FNS makes every effort to comply with the E-Government Act, 2002. For example, focus groups concerning Web-site development will be accomplished via computers. The agency also uses electronic methods to collect feedback from Program staff about materials that are disseminating through the Web Site. The focus group discussions and interviews may be video or audio taped and transcribed to maximize access to detail.

4. Describe efforts to identify duplication.

Information collection under this package builds on rather than duplicate any prior research. The agency coordinate all information collection thru a central staff located in the Office of Research and Analysis and consults with programs and CNPP about impending data collections. As previously stated, formative input and feedback provides insight into in how best to reach and motivate the FNS target populations. The information obtained will provide input regarding consumer's preparations on the usability of new materials, products and dissemination methods during both the developmental and testing stages.

5. Describe the impacts on small businesses or other small entities.

The information collection will not have an impact on small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

Failure to collect information would decrease the efficacy of interventions. If FNS does not collect this information, valuable input from FNS' culturally and ethnically diverse populations would not be obtained. Research has consistently shown that formative input and consumer testing of materials during development is critical and improves the acceptance and effectiveness of educational efforts. This information collection will assist in the development and communication of messages based on the current *Dietary Guidelines for Americans* to the FNS target audience. The target groups for the nutrition assistance programs consists primarily of low-income populations that are at greater risk for developing diet-related health problems such as obesity.

7. Explain any special 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.

Reporting will occur when necessary in order to carry out multiple information collections for various projects. No recurring requirements will be necessary as each information collection will be a one-time collection.

8. Provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice.

Notice of this data collection was published in the Federal Register, Volume 74, Number 208, Thursday, October 29, 2009. FNS received one comment See **Appendix 2.**

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

The 60-day notice published in the Federal Register allows the public and stakeholders an opportunity to comment on this collection.

9. Explain any decision to provide any payments or gifts to respondents.

Focus group and selected interview participants will receive a cash stipend intended to reimburse for expenses such as transportation and childcare costs. Amounts and justifications will be determined on an individual project basis. This information will be included in the memo provided to OMB for each formative research project.

10. Describe any assurance of confidentiality provided to respondents.

FNS and Contractors will follow procedures for assuring and maintaining confidentiality consistent with the Privacy Act during all stages of data collection. Focus group participants will receive information about confidentiality in an advance letter and/or before the focus groups begin. Participants in the semi-structured intercept interviews and telephone interviews will receive information about confidentiality before beginning the interviews. When appropriate, respondents will be informed that all information will be confidential by the information collection team and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law.

Release forms for focus groups and interviews will cite the Privacy Act.

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

Information collection will 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 responses, annual hour burden, and an explanation of how the burden was estimated.

Research Method	Respondents	Responses per Respondent	Total Annual responses per Respondents	Time per Response in Minutes	Total Annual Burden in Minutes	Total Annual Burden in Hours
Focus Group Screeners	3,000	1.0	3,000	10	30,000	500
Interview Screeners/Surveys	1,400	1.0	1,400	10	14,000	233
Focus Groups	1,500	1.0	1,500	120	180,000	3,000
Intercept Interviews	800	1.0	800	30	24,000	400

Dyad/Triad Interviews	200	1.0	200	60	12,000	200
Telephone Interviews	1,500	1.0	1,500	15	22,500	375
Surveys	800	1.0	800	30	24,000	400
Web-based Collections	800	1.0	800	30	24,000	400
Confidentiality Agreements	9,000	1.0	9,000	10	90,000	1,500
Total	10,000		19,000		420,500	7,008

The total estimated burden is 7,008 hours. Estimates are based on both historical numbers of respondents from past projects as well as projections for projects to be conducted in the next three years.

b. Provide estimates of annualized cost to respondents for the burden hours

for collections of information.

Testing Instrument or Method	Total Burden Hours	Hourly Rate (\$)	Total Cost
Focus Group Screeners	500	16.75	\$ 8,375.00
Interview/Survey Screeners	233	16.75	\$ 3,902.75
Focus Groups	3000	16.75	\$ 50,250.00
Intercept Interviews	400	16.75	\$ 6,700.00
Dyad/Triad Interviews	200	16.75	\$ 3,350.00
Telephone Interviews	375	25	\$ 9,375.00
Web-based Collections	400	16.75	\$ 6,700.00
Survey Instruments	400	16.75	\$ 6,700.00
Confidentiality Agreement	1125	16.75	\$ 18,843.75
	375	25	\$ 9,375.00
Total	7,008	184	\$ 123,571.50

¹ \$16.75 hourly rate for nonprofessionals/adults (7.25 minimum wage + \$9.50 child care).

² \$25.00 hourly rate for professionals.

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

For the respondents there are no capital or operating and maintenance costs associated with this collection. The only cost to respondents will be value of the time spent responding as explained in chart above.

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

The Agency incurs costs in setting up testing environments to include such things as hiring contractors, facilitators or moderators, renting meeting space, in providing cash stipends, etc. Costs will be determined on an individual project basis and will be included in the memo provided to OMB for each formative research project to be conducted. Based on historical data we expended about \$475,000 over the last three years. (Annualized this amount would be \$158,333.00)

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

This is an extension of a currently approved data collection. There are no changes of the currently approved amount of 7,008 hours as the agency projection current hours will be sufficient to meet future formative research needs. This OMB submission is for individual data collection events, which will consist of one-time information collections or data collections over a specific period of time.

16. Address any complex analytical techniques that will be used for collection of information whose results will be published. Outline plans for tabulation and publication.

FNS will not use complex analytical techniques in for data resulting from this collection of information. Findings from all research will be summarized and submitted in reports to USDA-FNS. The reports will describe the focus group and/or other methods used, findings, conclusions, implications, and recommendations enhance development of nutrition education and outreach materials for low-income population groups. In the reports, the Contractors will address recommendations to enhance resources and effective

dissemination strategies. The reports will also describe some of the factors that may influence the target audience in making behavior changes. There will be no extensive quantitative analysis of data. No attempt will be made to generalize the findings as nationally representative or statistically valid.

After data collection has been completed, it is anticipated that the findings will be reported in appropriate journals, professional meetings and conferences, training for FNS and program staff, etc. in order to disseminate information and promote appropriate use to those who interact with a similar target audience.

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

FNS is not seeking exemption from this requirement.

18. Explain each exception to the certification statement identified in Item 17.

There are no exceptions to the certification statement being requested.