

SUPPORTING STATEMENT JUSTIFICATION FOR FOOD SAFETY EDUCATION CAMPAIGN INITIAL EXPLORATORY RESEARCH

1. Circumstances Making Collection Of Information Necessary:

This is a request for a revision of a currently approved information collection addressing paperwork requirements related to exploratory research for the Food Safety and Inspection Service (FSIS)'s forthcoming public service advertising campaign on food safety.

The 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, in partnership with the Ad Council, the Food and Drug Administration, and the Center for Disease Control, is developing a new national public service advertising campaign to educate the public about the importance of safe food handling and how to reduce the risks associated with foodborne illness. As part of the ongoing campaign development process, the Ad Council, on behalf of the Agency, is conducting information collections to assess the target audience's perceptions, beliefs, and behaviors relating to food safety prior to the development of a campaign communications strategy to ensure an effective and insightful communications program.

After receiving a briefing on foodborne illness and USDA priorities for the public education campaign, the Ad Council and JWT, on behalf of FSIS, conducted an audit of existing research and statistics surrounding the issue and prevention behaviors. Following this review, the Ad Council and JWT conducted consumer research to better understand perceptions of foodborne illness and food safe behaviors held by the target audience. These research sessions were conducted with OMB approval in November 2010. Next, the Ad Council and JWT developed a communications strategy based on research findings that clearly articulates the proposed approach to communications.

JWT then developed creative concepts - scripts, graphical treatments, etc - that stem directly from the communications strategy. Before producing

these concepts into finished advertisements, the final research step is creative concept refinement research. As described below, the Ad Council and JWT will conduct qualitative consumer research to solicit consumer feedback on the draft campaign concepts. These sessions will help identify any areas of improvement to consider prior to production of the finished advertisements. Finally, prior to the release of the advertising campaign, the Ad Council will conduct pre- and post-wave tracking studies to monitor awareness of the campaign as well as any changes in perceptions of foodborne illness and reported safe food handling behaviors. A separate OMB approval package will be submitted for this tracking study.

FSIS has an approved information collection through the use of in-depth interviews with members of the campaign's target audience. Interviews are an important information gathering technique because they allow for in-depth conversations with the target audience which provide insights that will inform the ultimate advertising strategy. And this initial exploratory collection will help to refine the campaign's messaging goals.

The campaign targets parents, aged 20 to 40, who are caregivers for children between the ages of 4 and 12. Parents have been identified as the target audience because they are most likely to be preparing food for themselves and others, and they have an incentive to listen to food safety messages and adopt or change their behaviors as a result. The goal of this exploratory research is to learn more about the target's perceptions, beliefs, and knowledge. All findings will be used by the volunteer advertising agency to develop a campaign strategy, and eventually, advertisements in support of the campaign objective. Once developed, the campaign advertisements will appear across a range of donated media platforms including TV, radio, print, outdoor, and online, with the goal of communicating the message to and inspiring behavior change in the target audience.

FSIS is requesting a revision of this information collection to include the use of in-depth interviews (one-on-ones) and triad discussions with members of the campaign's target audience. Such discussions with consumers are an important information gathering technique because they provide insights that can be used to refine creative concepts before production. Triads facilitate discussion between peers about the advertising and can help introduce a range of perspectives and reactions. One-on-one interviews allow for a more prolonged conversation with one respondent during which the moderator may probe more deeply than is possible in a group of three. The mix of IDIs and triads will ensure a balanced discussion of the creative concepts over three markets.

The stimulus that has been submitted to OMB contains the universe of

creative concepts that will be exposed to respondents. For presentation to respondents these concepts will be reformatted to fit in different media. All respondents, in triads and one-on-one interviews, will be shown a range of concepts from the submitted stimuli, but due to time constraints, every respondent will not be exposed to every draft advertisement. Over the course of the interviews in three markets, a wide range of the concepts will be shared, facilitating the revision and optimization of concepts prior to production.

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

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

Pilot Research

The pilot research has been approved by OMB.

As a part of the pilot effort, the Ad Council on behalf of FSIS plans to conduct exploratory research to aid in the development of a campaign strategy and creative concepts. The Ad Council, working with a third-party research vendor and the volunteer ad agency, JWT, will conduct in-depth interviews (IDIs) with 30 screened parents in Houston, Philadelphia, and Chicago. The interviews will last one hour each and seek to assess attitudes, beliefs, and behaviors pertaining to food handling and food safety (i.e., clean, separate, cook, and chill), media habits, and demographic and personal information (annual household income, education level, and ethnic origin). It is expected that there will be about 214 non-respondents to the interviews, i.e., parents who are contacted but chose not to participate.

The data collected in the interviews will allow the Ad Council to probe the knowledge, perceptions, and beliefs that members of the target audience hold about food safety. The information collected will be used to help develop the campaign's messages, materials, and approaches in order to improve its overall effectiveness. Addressing any issues identified during the exploratory research will help ensure that a planned, nation-wide Food Safety Education Campaign is successful in promoting behavior among the general population.

The methodology for the exploratory research being proposed is qualitative and is meant to help develop a communications strategy based on consumer insights. The results of this study will not be generalizable to the overall population and will not produce statistically significant data. However, conducting in-depth interviews allows the advertising agency to

hear participants speak candidly about their views on the subject of food safety, which is invaluable to the creative development process, and will ultimately result in stronger advertising.

Creative Concept Refinement Research

FSIS is requesting approval for the Creative Concept Refinement Research.

The Ad Council, working with a third-party research vendor and the volunteer ad agency, JWT, will conduct in-depth interviews (IDIs) with 9 screened parents in Tucson, AZ, Memphis, TN, and Providence, RI. The interviews will last one hour each. Additionally, 9 triad discussions will be conducted with 27 respondents across the same markets. A total of 36 respondents will participate. Three IDIs and three triads (9 respondents) will be conducted in Spanish with Hispanic respondents, for a total of 12 respondents participating in Spanish. In total it is expected that there will be about 327 non-respondents to the interviews, i.e., parents who are contacted but chose not to participate.

The data collected in the interviews will allow the Ad Council to better understand how effectively the creative concepts are communicating the key campaign message and identify any areas for refinement prior to production. The information collected will be used to help refine the campaign advertisements and communications assets. Addressing any issues identified during the concept refinement research will help ensure that a planned, nationwide Food Safety Education Campaign is successful in promoting safe food handling behavior among the general population.

The methodology for the research being proposed is qualitative and is meant to help refine the creative concepts based on consumer insights. The results of this study will not be generalizable to the overall population and will not produce statistically significant data. However, this study will allow the advertising agency to hear respondents speak candidly about their reactions to the advertising, which is an invaluable part of the creative development process.

There are 149.55 total burden hours for the information collection request relating to the Food Safety Education Campaign exploratory research.

3. Use Of Improved Information Technology:

Respondents will be recruited via telephone and will visit a pre-

selected research facility for an in-person interview. The screener document has been approved by OMB for use in the pilot research study. This screener will be unchanged for this creative concept research.

4. Efforts To Identify Duplication:

This information is not available from any other source, either public or private.

5. Methods To Minimize Burden On Small Business Entities:

Only consumers will be surveyed.

6. Consequences If Information Were Collected Less Frequently:

This is a one time study.

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 listed above.

8. Consultation With Persons Outside The Agency:

FSIS has consulted with the Ad Council and JWT in developing this research.

9. Payment or Gifts to Respondents:

The 30 respondents in the pilot research will receive payment of \$75 for their participation in the interviews. This amount is comparable to the incentives that the Ad Council provides during market research across its PSA campaigns. While this incentive is higher than the amount typically provided during government consumer research, factors contributing to the higher cost include: 1) timing constraints that necessitate short turn-around for the research; 2) the narrow target audience - Since the research seeks to speak with a specifically defined target, incentive payments at standard private market research rates are essential. In addition, while the FSIS is the sponsor, the research is being conducted by a third-party research vendor and being identified to respondents as market research rather than a specifically government-sponsored project.

The 36 respondents in the creative concept refinement research will receive a payment of \$50 for their interview.

10. Confidentiality Provided To Respondents:

The vendor will include a statement about confidentiality for respondents that specifies that respondent data will not be called out specifically or identified with them personally. All reporting to FSIS will be anonymous and responses and findings will not be identifiable to any one respondent. While interviews will be videotaped, this is only for the purposes of report writing, and no video recordings - nor any personal information - will be retained by the FSIS or the research vendor.

11. Questions Of A Sensitive Nature:

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

12. Estimate of Burden

The Ad Council estimates that in order to recruit 30 respondents for in-depth interviews (IDIs), 214 will choose not to respond, resulting in a total of 244 respondents who will be contacted and screened for research via telephone - each responding once for 5 minutes. The 30 respondents who qualify for participation in IDIs will respond once more, participating in an IDI at the research facility that will take each participant an average of 90 minutes, including travel to and from the facility. The total burden for the pilot research is 30 interview respondents and a total of 65.3 burden hours.

PILOT RESEARCH

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total Annual Time in Hours
Screening - respondents and non-respondents	244	1	244	5	20.3
Interviews - Respondents	30	1	30	90	45
Total	244	1	274	95	65.3

The Ad Council estimates that in order to recruit 36 respondents for in-depth interviews (IDIs), 327 will choose not to respond, resulting in a total of

363 respondents who will be contacted and screened for research via telephone - each responding once for 5 minutes. The 36 respondents who qualify for participation in IDIs or triads will respond once more, participating in an IDI or triad at the research facility that will take each participant an average of 85 minutes, including travel to and from the facility in addition to the five minute recruiting call. The total burden for the concept refinement research is 36 interview respondents and a total of 84.25 burden hours.

CREATIVE CONCEPT REFINEMENT RESEARCH

Type of Respondent	No. of Respondents	No. of Responses per Respondent	Total Annual Responses	Time for Response in Mins.	Total annual time in hours
Screening - non-respondents	363	1	363	5	30.25
Interviews - Respondents	36	1	36	90	54
Total	363		399		84.25

There are no costs to the respondents other than their time and modest transportation costs. The Agency estimates that it may cost respondents \$12 an hour in loss of potential salary by participating in the survey. Respondents will spend a total of 149.55 hours and \$1794.6.

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 \$38,000 for the pilot research and \$35,000 for the creative concept refinement research. The total cost is \$73,000. The costs arise from recruiting, data collection, analysis, and reporting.

15. Reasons For Changes In Burden:

There is a revised information collection resulting in a program change of 84.25 additional 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 the interview guide.

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.