

The SunWise Program
ICR # 1904.07

U. S. Environmental Protection Agency
Office of Air and Radiation

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title of Information Request

The title of this Information Collection Request (ICR) is The SunWise Program (ICR# 1904.07; OMB Control Number 2060-0439).

1(b) Short Characterization/Abstract

The SunWise Program was initiated in 1998 through a statutory mandate under Title IV of the Clean Air Act. The long term objective of the SunWise Program is to reduce the incidence of, and morbidity and mortality from skin cancer, cataracts, and other UV-related health effects in the United States. Short term objectives include: 1) reducing the risk of childhood overexposure to the sun by changing the knowledge, attitudes, and behaviors of elementary school children and their care givers; and 2) improving the availability of accurate, timely, and useful UV data directly to schools and communities across the United States.

The SunWise Program builds on traditional health education practices through the use of existing curricula, learning standards, scientific strategies, and evaluation mechanisms. The Program is a collaborative effort of schools, communities, health professionals, educators, environmental organizations, meteorologists, local governments, federal agencies, and others. Participating schools sponsor classroom and school activities to raise children's awareness of stratospheric ozone depletion, UV radiation, and the largely preventable health risks from overexposure to the sun, as well as simple sun safety practices. All educators interested in participating in this partnership program are asked to register using the online form (www.epa.gov/sunwise/becoming.html and www.epa.gov/sunwise/becoming_partner.html) or a hard copy version distributed by EPA. EPA will use the information provided through this registration to maintain a database of participating schools and organizations and a mailing list for information distribution purposes. Participating schools and organizations receive a variety of materials, including a classroom "Tool Kit" of games, songs, puzzles, story books, videos, access to the internet UV intensity mapping/graphing tools, and more. The Tool Kit also includes sample sun safety policies and guidelines to help expand the sun safety message beyond the classroom.

Teachers who sign up for SunWise are asked to complete a survey at the end of program implementation. Results of these surveys are used to fine-tune existing SunWise materials and develop new ones that better meet our participants' needs. Teachers are also asked if they are interested in administering a brief survey to their students before and after program implementation. The surveys will be made available on the SunWise website for all teachers that express interest in the survey process. Student survey responses are voluntary and anonymous. The results from the student surveys are used to gauge program effectiveness and also help guide materials development.

SunWise is also seeking additional qualitative information regarding barriers to the promotion of SunWise, as well as teachers' receptiveness to a new recognition program that SunWise is considering developing. The program would recognize levels of SunWise teaching for interested educators. The more SunWise teaching and classroom and school-wide sun safety changes implemented by an educator, the higher her/his level of SunWise (similar to a bronze, silver and gold level) recognition. This new recognition/incentives program would allow EPA to get a better grasp on the level of engagement with SunWise, and would allow for future effectiveness studies comparing impacts on student knowledge, attitude and behavior with an educator's level of engagement. To gather qualitative information on these issues, the SunWise Program will conduct voluntary, individual, semi-structured telephone interviews with willing educators.

In addition, EPA has teamed with other members of the National Council on Skin Cancer Prevention, which include the American Cancer Society, the American Academy of Pediatrics, and the Centers for Disease Control and Prevention, to support the *Don't Fry Day* (DFD) campaign. As part of this campaign, educators are asked to pledge to incorporate sun safety into their spring and summer activities. The DFD pledge is available online at: <http://www.epa.gov/sunwise/dfdpledge.html>.

Further, SunWise has developed an online interactive SunWise Sun Safety Certification Program that enables students, adults, organizations, and employers to develop credentials¹ on sun safety awareness and behaviors. In order to gauge the certification program's effectiveness, EPA will be collecting information on demographics, knowledge, attitudes, intended behavior, and behavior of the tutorial users. User types include: outdoor recreation staff at camps, parks, recreation programs, sports organizations, lifeguards, etc. The certification program is available online at: <http://www.epa.gov/sunwise/tutorial.html>

Finally, EPA will pretest a new survey for SunWise non-school partners. While schools are the primary programmatic component of SunWise, SunWise is also promoted through registered 501(c)(3) organizations such as science centers and camps, children's museums, and scouting groups, as well as other not-for-profit organizations like local, county and state health, recreation and education departments. The new partner survey will aim to understand how the SunWise Program is being implemented by non-school partners, and how it can be improved.

PREVIOUS TERMS OF CLEARANCE:

On November 2, 2001, OMB approved ICR #1904.01 with Terms of Clearance. EPA has addressed OMB's terms in the following manner.

This collection is approved in part and disapproved in part. EPA is approved to collect registration information and to conduct the requested student survey and teacher survey. These portions of the collection are approved for two years, until November 2003. OMB understands

¹ The SunWise Sun Safety Certification, discussed in more detail in Part B(iii) of the supporting statement, is an online tutorial for outdoor recreation staff. The tutorial provides the user with the background on why sun safety is important, teaches him/her how to be safe in the sun, and then gives the user some scenarios to test their understanding of the concepts taught throughout. At the end of the training, the user is given a certificate that proves they completed the training, which typically takes less than an hour. More information is available at www.epa.gov/sunwise/tutorial.html.

that EPA no longer intends to collect information under the Parent Survey and the School Administrator Survey. These two surveys are not approved. OMB has adjusted the burden of the collection accordingly from EPA's request.

EPA Response: We will not be surveying parents or school administrators under this ICR renewal.

As discussed in Part B of the revised supporting statement, EPA plans to assess two sampling issues in Fall 2002 based on results from the first year of the student survey: (1) whether it is necessary to include in the sampling protocol an approach to stratify between warm and cool states, and (2) whether it is necessary to include an additional sampling stage to sample classrooms within a school that has been selected for participation. EPA should report to OMB its findings with regard to these issues before beginning the second year of sampling, and advise OMB whether it intends in the second year of the collection to (1) stratify between warm and cool states in the first stage of sampling,

EPA Response (sent to OMB on 8/29/02): We have conducted this analysis and found no differences between the students in the 37 cooler states versus the 13 warm states, as categorized by the UV Index values. We measured change in scores from pretest to posttests on children's knowledge of sun protection, attitudes toward the sun, and current sun protection practices and found minimal differences in the change. Therefore, with no differences between the two groups, there would be no reason to stratify our findings.

and/or (2) add a sampling stage to sample classrooms within a selected school.

EPA Response (sent to OMB on 8/29/02): We analyzed the composition of registrants in the SunWise database by region of the country and the number of schools that contained more than one classroom. It appears that 75 percent of schools in warm and cool climates have no more than 1 classroom per school with negligible difference by region. There is little evidence of clustering or differences in clustering between regions of the country. If that were the case, we would have to account for this effect by performing tests of intraclass correlation.

OMB also notes that EPA must include the OMB number, expiration date, and Paperwork Reduction Act notice on the teacher survey before using that instrument to collect information.

EPA Response: All information is now included on the teacher survey. See attachment #1a and 1b for verification.

On February 6, 2008, OMB approved ICR #1904.03 with Terms of Clearance. EPA has addressed OMB's terms in the following manner.

This ICR is approved in part. The registration of educators component is approved at this time. Other components of this ICR is not approved at this time, but the agency may resubmit these components with no significant or material change, pending the results of pre-tests that will examine the readability of the survey instrument.

EPA Response: The other components were resubmitted, and OMB approved the requested documents.

2. Need for Use of the Collection

2(a) Need/Authority For The Collection

This collection will be used for program material distribution and to determine program effectiveness and participant satisfaction.

Educators will be asked to fill out a simple registration form, which we use to mail out the program materials and keep track of the Program's:

- geographic reach (Which states/regions have SunWise schools?);
- grade-level and subject-matter distribution (How many 1st grade teachers are using SunWise? How many math teachers are using SunWise? etc.); and
- student participation level (How many students is SunWise potentially reaching?).

Surveys to be administered include:

- **Teacher online survey** for measuring their receptivity to the educational component of the Program and experience with the SunWise Tool Kit and educational resources;
- **Student survey** to identify sun safety knowledge, attitudes, and behaviors among students before and after participation in the Program;
- One-on-one semi-structured **telephone interviews with teachers** to complement the information collected through the self-reported Teacher Survey instrument by providing richer, qualitative information regarding barriers to the promotion of SunWise, as well as teachers' receptiveness to a new recognition program that SunWise is considering developing;
- Embedded questions within the SunWise **Don't Fry Day pledge** collect information related to demographic and mailing information and intent for incorporating sun safety activities into spring and summer teaching.
- Embedded questions within the **SunWise Sun Safety Certification Program** measure receptivity to sun protection, demographic information, and current practices, attitudes and knowledge.
- **Pretest of the partner survey** for developing a survey to measure and understand partners' receptivity to and use of the SunWise Tool Kit and other educational resources.

The data will be analyzed and results will indicate the Program's effect on participants' sun safety knowledge, attitudes, and behaviors, as well as help SunWise understand how the Program is being implemented and how it can be improved. Responses to the collection of information are voluntary. Responses to the collection of information remain confidential, and responses to the student survey are anonymous.

The SunWise Program recognizes the challenge of measuring the progress and evaluating the effectiveness of an environmental and public health education program where the ultimate goal

is to reduce risk and improve public health. Therefore, the continual and careful evaluation of program effectiveness through a variety of means, including data from pre- and post-intervention surveys, tracking and monitoring of classroom activities and school policies, and experts, is necessary to monitor progress and refine the program.

2(b) Practical Utility/Users of the Data

EPA/SunWise will use the survey results to review process and impact results—including cost effectiveness—and adapt as appropriate its messages, approaches, and materials. Survey results will enable EPA/SunWise to better meet the needs of its educator and student participants, with the long range goal of reducing the incidence and effects of skin cancer and other UV-related health problems among children and adults.

Past collections have resulted in numerous publications and presentations at health-related conferences. Examples can be found at the links below:

- <http://apha.confex.com/apha/138am/webprogram/Paper216559.html>
- http://www.cdc.gov/nccdphp/conference/pdf/program_book_2009.pdf
- <http://pediatrics.aappublications.org/cgi/content/abstract/121/5/e1074>
- <http://epa.gov/sunwise/evaluation.html>

3. Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

The information required to complete the survey instruments and interviews for the SunWise Program is not duplicative of information otherwise available to EPA. In the early stages of the SunWise Program's development in 1997, several searches for information were completed in consult with external stakeholders, including representatives from the following organizations:

American Academy of Dermatology
American Cancer Society
Boston University Medical Center - Skin Oncology, Cancer Prevention & Control Center
Centers for Disease Control and Prevention
National Association of Physicians for the Environment
National Safety Council
The Skin Cancer Foundation

Results from these consultations indicated that no other formal, student-focused, sun safety programs were being implemented in the United States, nor were surveys being conducted on attitudes and practices of children relating to sun exposure.

In addition, to EPA/SunWise's knowledge, there is no other sun safety certification available to outdoor recreation staff in the U.S., therefore it is essential that accurate information on the users and use of the certification program be collected for program refinement.

Conducting timely and useful process evaluation is also of importance if the SunWise Program is to continue providing high-grade and pertinent resources for educators across the United States.

3(b) Public Notice Required Prior to ICR Submission to OMB

Official notice of this proposed collection appeared in the Federal Register on September 3, 2010 (75 FR 54143). One comment was received. Since EPA coordinates with other federal and non-federal entities working to prevent skin cancer and other health effects from overexposure to the sun, and both Congress and EPA allocate funding for the program, no further justification for the comment is needed.

3(c) Consultations

The following professionals were consulted during the development of the three survey instruments:

- Alan Geller, Harvard School of Public Health, Division of Public Health Practice, (617) 495-4000
- Dave Buller, PhD, AMC Cancer Research Center, (303) 239-3511
- Dr. Barbara Gilchrest, Chair, Department of Dermatology, Boston University School of Medicine, (617) 638-5538
- Dr. Donald Miller, Assistant Professor of Epidemiology and Health Policy, Boston University School of Medicine, (781) 687-2865
- Dr. Amy Mack, Psy.D., ICF International, (703) 219-4311

3 (d) Effects of Less Frequent Collection

SunWise depends on registration information to:

- maintain an accurate list of participants; and
- ensure timely distribution of program materials and program updates to participants.

SunWise depends on survey responses to:

- help guide program development;
- measure participant satisfaction with the program;
- test new ideas for recognition and incentives; and
- elicit basic information on attitudes and practices of children and their caregivers relating to sun exposure.

SunWise depends on certification program information to:

- determine the current knowledge, attitudes, behavioral intentions and behaviors of individuals taking the tutorial;
- determine which tutorial to provide to the user;
- measure how many and what type of users are becoming certified;

- ensure the tutorial does not take too long to complete;
- ensure rigor and enthusiasm for the tutorial; and
- determine whether or not the tutorial is delivering the information in an easy-to-understand manner.

Conducting the surveys and information collection less frequently may slow down the Program's ability to institute participants' desired changes.

3(e) General Guidelines

All OMB guidelines will be adhered to by EPA/SunWise Program.

3(f) Confidentiality

Names of participating schools and organizations may be made public. All names of registered educators and other participating individuals will remain confidential. All responses to the collection of survey information will remain confidential. All student surveys are also completed on an anonymous basis (no identifying information is included on the survey form). Certification program users will be asked to provide their first and last name so they can be given a certificate of completion with their name on it; however, the information will not be collected by EPA.

EPA and a contractor will analyze survey results and proceed accordingly.

3(g) Sensitive Questions

The survey instruments of this ICR contain no sensitive questions.

4. The Respondents and the Information Requested

4(a) Respondent/SIC and NAICS Codes

Entities potentially affected by this action are elementary, middle, and high school students and educators (SIC Div. I: Group 8211, NAICS code: 61111), as well as recreation workers (NAICS code: 813400), health educators (NAICS code: 999300), and preschool teachers (NAICS: 624400).

4(b) Information Requested

The registration form (Attachment 1a and 1b, also available at www.epa.gov/sunwise/becoming.html and www.epa.gov/sunwise/becoming_partner.html) is a simple, 10-minute questionnaire that asks teachers to provide: the name and contact information of the participating school; school composition (e.g. grade levels); and information specific to the interest areas of the registering teacher. The purpose of this form, which is identical to forms approved under numerous SunWise Program ICRs, is to ensure that EPA distributes the most relevant education materials to all SunWise participants.

The survey instruments covered under this ICR are as follows:

- **Teacher Survey** (Attachment 2): Adapted based on feedback from teachers and to capture more information on specific aspects of the program educators are using, this survey is slightly different from the version approved under the previous ICR. Educators will be asked to evaluate their and their students' receptivity to sun safety resources provided by EPA. Additionally, educators will be asked about how they implemented the SunWise program in their school/classroom and how many students they reached. Finally, educators will be asked about areas for program growth, including their receptivity to new resources and an updated recognition program. Educator feedback about the usefulness of classroom and school materials will be vital to the refinement of program materials. This information can be submitted online. Part B(i) of the Supporting Statement provides additional information on the teacher survey design.
- **Student Survey** (Attachment 3a and 3b): Identical to the version approved under the previous ICR, this survey will be administered by volunteer teachers to participating students before and after implementation of SunWise activities. Pre-test and post-test surveys are nearly identical in content, with the exception of one question in the post-test which is aimed at verifying that the student has participated in SunWise. This simple, 10-minute questionnaire elicits basic information on knowledge, attitudes, and practices of children relating to sun exposure. The survey is identical to that previously approved by OMB (Control No. 2060-0439). Part B(i) of the Supporting Statement provides additional information on the student survey design.
- **Teacher Telephone Interviews** (Attachment 4): This survey is new to the SunWise Program ICR and was developed to complement the information collected through the self-reported Teacher Survey instrument. Some teachers will be asked to participate in one-on-one, semi-structured telephone interviews to provide qualitative information regarding barriers to the promotion of SunWise, as well as teachers' receptiveness to a new recognition program that SunWise is considering developing. An interview guide with topics for discussion is provided in Attachment 4. Part B(ii) of the Supporting Statement provides additional information on the teacher survey design.
- **SunWise Don't Fry Day pledge:** The pledge is new to the SunWise Program ICR. Embedded questions within the pledge collect information related to demographic information and intent for incorporating sun safety activities into spring and summer teaching. This information can be submitted online, and the pledge is available at: <http://www.epa.gov/sunwise/dfdpledge.html>
- **SunWise Sun Safety Certification Tutorial Questions:** The questions used are identical to the questions approved under the previous ICR. Certification program users will be asked to provide their first and last name so they can be given a certificate of completion with their name on it. The information will not be collected by EPA. Additionally, users will be asked a series of questions to determine their current sun protection knowledge, attitudes and behaviors, and their receptivity to sun protection generally. The questions being asked will also help educate the user by reminding them of their own behavior in comparison to the desired behavior (practicing sun safety). Part B(iii) of the Supporting Statement provides additional information on the certification program survey design.
- **Pretest of the Partner Survey** (Attachment 5): A new component to the SunWise Program ICR, selected partners will be asked to pretest a survey to measure partners'

receptivity to the SunWise Tool Kit and other educational resources. The SunWise Tool Kit provides more than 50 activities in math, science, P.E., health, social studies, language arts, etc. for kindergarten through eighth grader learners. Historically, SunWise has not captured the effects of the SunWise Program in non-school venues (classified as partners). Pretesting a survey will allow the program to develop a survey to address this lack of information and should improve the ability of the program to document its effects in non-school settings. Part B(iv) of the Supporting Statement provides additional information on the pretest partner survey design.

Registration forms can be submitted electronically or in hard copy form using envelopes provided by EPA. The teacher survey is available electronically. Teachers will be given the option to return student surveys either by email, fax, or postage-paid envelopes provided by EPA. Neither the registration nor the surveys require that respondents keep records or maintain files.

5. The Information Collected

5(a) Agency Activities

The Agency activities associated with registration of participants done through the SunWise Program consists of the following:

- Maintain participant database;
- Maintain mailing list for information distribution purposes.

The Agency activities associated with surveying done through the SunWise Program consists of the following:

- Develop collection instruments;
- Answer respondent questions;
- Conduct individual telephone interviews with teachers;
- Audit and/or review data submissions;
- Reformat the data;
- Analyze the data and make program adjustments as needed;
- Store the data.

The Agency activities associated with the certification program done through the SunWise Program consists of the following:

- Store and consolidate data, none of which is sensitive or personal; and
- Review consolidated data and make adjustments as needed.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA will use electronic and hard-copy registration forms, electronic and hard-copy surveys, and telephone interviews.

Further details on the collection methodology and management for the surveying done through the SunWise Program are provided below.

Registration

EPA routinely promotes the SunWise Program through presentations and exhibits at meetings of nurses, teachers, and other educators. Registrants provide their name and contact information, including the name of their school, and state whether they are a classroom teacher, health teacher, gym teacher, or school nurse on paper copy registration forms. This information is then entered into a registration and tracking system housed on EPA servers. In addition to the paper copy registrations, EPA also registers educators and partners through an online registration page housed on EPA's SunWise program website. All information collected is protected by adequate security and the system is registered with the Automated System Security Evaluation and Remediation Tracking (ASSERT) program to meet reporting requirements under the Federal Information Security Management Act (FISMA).

The data is used to send registrants SunWise resources and alert registrants of sun safety-related opportunities and new resources. No personally identifiable information is shared outside of EPA and its contractors and grantees.

Teacher and Student Surveys

Teacher Surveys are conducted to determine:

- Students' satisfaction with SunWise activities and resources;
- Teachers' satisfaction with SunWise activities and resources;
- How and how often teachers are using the SunWise materials, resources and programming;
- How many students are receiving SunWise education;
- If teachers are sharing resources with other teachers;
- If school policies are being changed as a result of SunWise;
- If teachers are changing their own behavior;
- If students are changing their behavior;
- If teachers have suggestions for improving or creating new SunWise resources.

EPA will send a recruitment email in the Spring/Summer timeframe each year encouraging all registered participants to take the SunWise Teacher Survey (Attachment 2) hosted online. Participants may also be recruited through additional avenues, such as recruitment letters distributed through the SunWise Tool Kit, educator conferences, or direct mailings. Since this survey will be voluntary and self-selecting, it will not be generalizable to the entire pool of registered SunWise teachers. However, it will be informative and provide insight into how some teachers utilize SunWise materials and how EPA can encourage higher use rates.

Part of the Teacher Survey will be an optional student pre-test and post-test survey using the validated student survey used in the previous ICR period (Attachment 3a and 3b). There will be no control group for this portion of the survey, and no generalizations will be made from this

data. It will serve as a useful way to see if students are still getting the same benefit from the SunWise Tool Kit as in quasi-experimental study designs testing the same concepts (see previous ICR supporting statement for more details). Again, because this portion of the survey will be voluntary and self-selecting, the results will not be generalizable to every student that has received a SunWise education.

For those teachers that choose to participate, they will provide children with a double-sided, one-page anonymous survey instrument. After students complete the pre-test in the spring, teachers will lead the SunWise lessons. SunWise will recommend that participating teachers administer the post-test survey at least one month after teaching the SunWise lessons, and will ask teachers to report what the time gap was between SunWise lessons and administration of the survey.

All student surveys are anonymous. Since surveys are anonymous, no specific information on the child can be reported to parents or school staff. Surveys are done in the classroom setting, and conducted by the teachers. A letter explaining the survey and a parental passive consent form will be sent home with students prior to the survey administration, and pediatric dissent will be honored.

Teachers will be instructed to return completed student surveys to EPA by one of several ways, including scanning and emailing the surveys, faxing the surveys, or by requesting a self-addressed, stamped envelope from EPA.

EPA will ensure the accuracy and completeness of collected information by having all surveys reviewed by a contractor, grantee, or EPA staff. The data collected from the surveys will serve to provide information internally to help improve the SunWise Program. Since the results are not intended to be generalizable, no statistical approach is needed.

Part B(i) of the Supporting Statement presents more detailed information on the data collection, management, and analysis methods for the teacher and student surveys.

Teacher Individual Interviews

To complement the self-reported Teacher Survey instrument, individual interviews will be conducted with selected teachers to gather richer, qualitative information regarding:

- Teachers' involvement in the SunWise Program;
- What barriers teachers face to making school-wide changes in sun safety practices, and how SunWise may help them overcome those barriers;
- Which SunWise activities and resources teachers feel are the most effective;
- How teachers' approach to teaching SunWise activities has changed over time;
- How the SunWise Program can more effectively disseminate its materials and recruit more teachers;
- How the SunWise Program can encourage teachers to increase their involvement in SunWise and their promotion of sun safety in schools; and
- Receptiveness to an incentives or "Levels of SunWise" educator recognition program (not yet developed), and ideas for making such a program successful.

Interview participants will be recruited via a screening email to all registered SunWise educators asking (a) whether they have taught SunWise in the past two years; (b) how many years they have been teaching SunWise; and (c) whether they are willing to both complete an online teacher survey and participate in a one-on-one telephone interview. Teachers responding positively to both screening questions (a) and (c) will be grouped by region and length of participation, and across these groups, 50 teachers will be randomly selected to participate in the interview process. To the extent possible, the selected teachers will represent the geographical and participation range of SunWise, though the sample will not necessarily be representative in a statistical sense. The teachers that are not selected will still be encouraged to take the online survey, but will not be part of the group that will be individually interviewed. After the selected participants have taken the online survey, EPA will set up a convenient time to interview each of the selected teachers.

Teachers will participate in one online survey and one telephone interview per year over a three year period, with slightly different informational goals for each year. In the first year, the interview will include discussion about the development of an educator recognition or incentives program, while interviews in later years may focus on other areas of interest, such as parental involvement.

Since participation is both voluntary and self-selecting, the results of this qualitative study will not be generalizable to the entire pool of registered SunWise teachers. The data collected from the interviews will serve only to provide information internally to help improve the SunWise Program and the development of a new recognition program.

Part B(ii) of the Supporting Statement presents more detailed information on the data collection, management, and analysis methods for the teacher interviews.

SunWise Don't Fry Day Pledge

EPA will collect information as educators complete the pledge online. Prior to Don't Fry Day each year (the Friday before Memorial Day), EPA will review the information collected and summarize participation for promotional efforts. Additionally, EPA will mail a poster and stickers to all educators taking the pledge. The pledge is available at:

<http://www.epa.gov/sunwise/dfdpledge.html>

Certification Tutorial

EPA will collect information as participants take the tutorial. Many of the questions will help instill the information they are learning through the tutorial. Part B(iii) of the Supporting Statement presents more detailed information on the data collection, management, and analysis methods for the tutorial/certification program.

EPA plans to periodically review data collected from the certification program/tutorial and make refinements to the program as necessary. The knowledge gained through this information collection will inform programmatic decisions, and allow EPA to gain a better understanding of

the target audience to determine if additional intervention is needed in the outdoor recreation setting. While results cannot be generalized to the general outdoor recreation staff population due to the limitation of self-selection, the information will be informative and will be shared with partners and the public for improved tailoring of interventions to the outdoor recreation audience.

Pretest Partner Survey

EPA will undertake pretesting of a survey for non-school partners participating in the SunWise Program. These partners may include state and local health departments, childcare centers, museums, camps, and science centers. The purpose of the survey will be generally to better understand how non-school partners are interacting with the SunWise Program, as well as to determine:

- How and how often partners are using the SunWise materials, resources and programming;
- How many children are receiving SunWise education through non-school partners;
- Children's satisfaction with SunWise activities and resources;
- Partners' satisfaction with SunWise activities and resources;
- If partners are sharing resources with other partners;
- If partners are making organization-wide changes in sun safety practices, and how SunWise might help support those changes;
- If partners have suggestions for improving or creating new SunWise resources.

The pretesting is intended to determine the validity and effectiveness of the survey questions—e.g., whether questions measure what they are supposed to measure, whether partners understand what the questions are asking, and whether the questions are the right questions to gain a better understanding of how partners are interacting with the SunWise Program.

EPA will send a recruitment email in the Spring/Summer timeframe encouraging registered partners to participate in the pretesting of the partner survey (Attachment 5). Participants may also be recruited through additional avenues, such as recruitment letters distributed through the SunWise Tool Kit, educator conferences, or direct mailings. From those partners indicating their willingness to participate, EPA will sort the partners into types of partners (e.g., health departments, childcare centers, camps, and educational centers such as museums or science centers) and randomly select participants from each group for a total of 30 participants.

Depending on available resources and other constraints, the survey may be self-administered with feedback gathered from each participant over the telephone, or the survey may be administered in-person either in an individual or group setting, with feedback gathered through in-person interviews. Only one of these administration methods will be selected, depending on budget availability. In either case, participants will be asked if they understood all questions and whether there were questions they would suggest removing or adding to better reflect the participation of partners in the Program. Based on this feedback, EPA will revise the partner survey.

Part B(iv) of the Supporting Statement presents more detailed information on the data collection, management, and analysis methods for pretesting the partner survey.

5(c) Small Entity Flexibility

Not applicable.

5(d) Collection Schedule

Registration: All teachers are required to register for the Program if they wish to receive the SunWise Tool Kit (www.epa.gov/sunwise/becoming.html and www.epa.gov/sunwise/becoming_partner.html) and regular program updates.

Teacher and Student Surveys: All program participants are invited to take the Teacher Survey at any time during the year. As noted above, recruitment emails will be sent in the Spring/Summer to all registrants encouraging them to take the Teacher Survey, but it is always optional.

Teachers who opt for their classrooms to participate in the student pre-test and post-test surveys will be asked to administer the pre-tests before teaching the SunWise lessons, and then to administer the post-test survey at least one month after teaching the SunWise lessons.

Teacher Interviews: Participants (as selected using the method described in Part B(ii) of the Supporting Statement) will complete the online survey and one telephone interview per year over the three year period.

Don't Fry Day Pledge: All educators are invited to take the DFD pledge at any time during the year. A recruitment email will be sent in the Spring to all registrants encouraging them to take the pledge, but participation is always optional. Participants may also be recruited through additional avenues, such as educator conferences.

Certification Tutorial: All outdoor educators are invited to take the certification tutorial at any time during the year.

Partner Survey Pretesting: The partner survey will be pretested once in the three-year ICR period.

6. Estimating the Burden and Cost of the Collection

6(a) Estimating Respondent Burden

Registration: EPA developed the SunWise Program Registration Form with the Agency's Internet Support Team in Research Triangle Park, North Carolina. Input from a five-person focus group was used to determine average completion time. Teachers are asked to complete the registration form only once during their participation in the program for a total registrant burden of 10 minutes.

Annual estimated respondent burden:

Annual Respondent Burden- Registration	
Registrant Group	Hour Burden
Educator	0.17

Teacher and Student Surveys: During the development of the teacher survey, EPA, in consult with a contractor and less than nine educators reviewed the teacher survey to determine appropriate content and survey completion time. The teacher survey is administered one time each year and takes approximately 20 minutes to complete. If the teacher decides to conduct the student pre- and post-test surveys, additional time burden will be experienced by the teacher to administer the student surveys (noted below).

During the development phase of the student surveys, EPA, in consult with a contractor, pretested the survey with 9 children to determine appropriate content and survey completion time. The student survey will be administered once in years 1 and 3 (i.e., pre-test for Group A and post-test for Group B) and twice in year 2 (i.e., post-test from Group A and pre-test for Group B). Each survey will take approximately 10 minutes to complete, for an annual per student burden of 10 minutes.

Annual estimated respondent burden:

Annual Respondent Burden- Surveys	
Survey Group	Hour Burden
Student	0.17
Educator – No student survey	0.33
Educator – Yes student survey	0.5

Teacher Interviews: Some selected teachers will both complete the online teacher survey (estimated at 20 minutes, as discussed above), as well as participate in a 30 minute interview with EPA and/or a contractor, for a total annual per teacher burden of 50 minutes.

Annual estimated respondent burden:

Annual Respondent Burden- Interviews/Surveys	
Survey Group	Hour Burden
Educator	0.83

Don't Fry Day Pledge: Educators will be invited to take the *Don't Fry Day* pledge at any time throughout the year. The pledge can be completed online and requires participants to fill out their name, address, school, and commitment to sun protection. The total respondent burden is estimated to be 5 minutes per year.

Annual estimated respondent burden:

Annual Respondent Burden- Pledge	
Survey Group	Hour Burden
Educator	0.08

Certification Tutorial: Users will be asked a series of questions about sun protection to determine their demographics (no personal identifiers will be captured), knowledge, attitudes, behavior, perception of others they work with, and the environmental conditions in the place where they work. They will also be asked to enter their first and last names so it can be put into a certificate that they can print. This information will not be saved by EPA. The total respondent burden is estimated to be 7 minutes.

Annual estimated respondent burden:

Annual Respondent Burden –Tutorial/Certificate Questions	
Survey Group	Hour Burden
Student	0.12
Outdoor Educator	0.12

Partner Survey Pretesting: To pretest a new survey for SunWise non-school partners, some selected partners will complete the survey (estimated at 20 minutes, based on the survey's similarity to the teacher survey described above), as well as participate in a 30 minute interview with EPA and/or a contractor to discuss the survey and ways to improve it. The total respondent burden is thus estimated at 50 minutes.

Annual estimated respondent burden:

Annual Respondent Burden- Partner Survey	
Survey Group	Hour Burden
Non-school Partner	0.83

6(b) Estimating Respondents Costs

The Bureau of Labor Statistics figures² were used to determine labor costs for these tables. In order to account for benefits and overhead, the average hourly wage rate of \$36.45 for a teacher and \$12.04 for a recreation worker (i.e., outdoor educator) were increased by 110% for a labor cost of \$76.55 per hour for teachers and \$25.28 per hour for outdoor educators.

For partners, the average of the average hourly wage of \$23.59 for a health educator and \$13.20 for a preschool teacher was calculated to determine the hourly labor cost, since these occupations are considered typical of SunWise’s non-school partners. This averaged hourly labor cost of \$18.40 was increased by 110% for a labor cost of \$38.63 per hour for partners to account for benefits and overhead.

Annual Respondent Burden and Cost- Registration			
Registrant Group	# of responses per participant	Hour Burden	Labor Cost
Educator	1	0.17	$1 * 0.17 * \$76.55 = \13.01

Annual Respondent Burden and Cost – Teacher and Student Surveys			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Student	1	0.17	$1 * 0.17 * \$0 = 0$
Educator – No student survey	1	0.33	$1 * 0.33 * \$76.55 = \25.26
Educator – Yes student survey	1	0.5	$1 * 0.5 * \$76.55 = \38.27

Annual Respondent Burden and Cost – Teacher Interviews/Surveys			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Educator	1	0.83	$1 * 0.83 * \$76.55 = \63.79

Annual Respondent Burden and Cost – Don’t Fry Day Pledge			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Educator	1	0.08	$1 * 0.08 * \$76.55 = \6.38

² http://www.bls.gov/oes/2009/may/oes_nat.htm and <http://stats.bls.gov/news.release/ecec.t02.htm>

Annual Respondent Burden and Cost – Tutorial/Certificate Questions			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Student	1	0.12	$1 * (0.12 * 0) = 0$
Outdoor Educator	1	0.12	$1 * 0.12 * \$25.28 = \3.03

Annual Respondent Burden and Cost – Partner Survey Pretesting			
Survey Group	# of responses per participant	Hour Burden	Labor Cost
Non-school Partner	1	0.83	$1 * 0.83 * \$38.63 = \32.19

The respondents will have no capital/startup or O&M costs.

6(c) Estimating Agency Burden and Cost

Registration: Registration information collection is done primarily through a website database feature. The start-up cost associated with designing the registration web page was approximately \$25,000, but that money has already been spent prior to previous ICRs. Maintenance of the website is estimated to involve three types of staff: EPA personnel, Grantees through the Senior Environmental Employee (SEE) Program, and contractor staff costing \$130 per hour. The EPA employees will take 4 hours/month or 48 hours per year. The cost of this labor is calculated based on a GS 13 Step 1 pay level living in Washington, DC (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6), making the total annual cost \$3,276.29. The contractor will spend 240 hours per year on the maintenance and enhancement of the registration and tracking system at an annual cost of \$31,200.

Finally, EPA will manually input all information received via hard-copy registration form onto the database. The costs of this labor are estimated to be 2000 hours per year at a SEE Program pay level of \$40,000 annually.

Agency Burden and Costs - Registration		
	Burden Hours	Total Costs (\$)
EPA (Annual)	2,288	\$74,476.29
EPA (3-Year ICR)	6,864	\$223,428.86

Teacher and Student Surveys: The contractor assists EPA in data collection and analysis. The contractor also provided technical support in the development of the surveys. To perform these

functions, EPA will contract for a total of 150 professional hours per year. At an average rate of \$130.00 per hour, the total cost for the contractor is about \$19,500 annually. Agency burden to manage this contract is estimated at 4 hours/month or 48 hours annually. The cost of this labor will be calculated based on a GS 13 Step 1 pay level (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (48) amounts to a total agency labor cost of \$3,276.29/per annum.

Agency Burden and Costs- Teacher and Student Surveying		
	Burden Hours	Total Costs (\$)
EPA (Annual)	198	\$22,776.29
EPA (3-Year ICR)	594	\$68,328.86

Teacher Interviews: The contractor assists EPA in data collection and analysis. The contractor also provides technical support in the development and deployment of the surveys and interview questions. To perform these functions, EPA will contract for a total of 150 professional hours per year. At an average rate of \$130.00 per hour, the total cost for the contractor is about \$19,500 annually. Agency burden to manage this contract is estimated at 4 hours/month or 48 hours annually. Agency burden associated with the coordination and participation in interviews is estimated at 50 hours per year. The cost of this labor will be calculated based on a GS 13 Step 1 pay level (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (98) amounts to a total agency labor cost of \$6,689.09/per annum.

Agency Burden and Costs- Teacher Interviewing/Surveying		
	Burden Hours	Total Costs (\$)
EPA (Annual)	248	\$26,189.09
EPA (3-Year ICR)	744	\$78,567.26

Don't Fry Day Pledge: To perform the data collection and analysis function, agency burden is estimated at 2 hours/month or 24 hours annually. The cost of this labor will be calculated based on a GS 13 Step 1 pay level (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (24) amounts to a total agency labor cost of \$1,638/per annum.

Agency Burden and Costs- Don't Fry Day Pledge		
	Burden Hours	Total Costs (\$)
EPA (Annual)	24	\$1,638.14
EPA (3-Year ICR)	72	\$4,914.43

Certification Tutorial: The contractor will maintain the tutorial, including the data collection component. The contractor will also analyze the data every other year (i.e., during year 1 and year 3 of the ICR). To perform this task, EPA has contracted for a total of 200 professional hours, 100 hours for each year of analysis. In addition, EPA has contracted a total of 12 hours each year for maintenance. At an average rate of \$130.00 per hour, the total cost for the contractor is \$13,000 per year for data collection in year 1 and 3, and \$1,560 per year for maintenance. Agency burden to manage this contract is estimated at 4 hours/month or 48 hours annually. The cost of this labor will be calculated based on a GS 13 Step 1 pay level (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6).

Agency Burden and Costs – Tutorial/Certification		
	Burden Hours	Total Costs (\$)
EPA (Annual) – Year 1 and 3	160	\$17,836.29
EPA (Annual) - Years 2	60	\$4,836.29
EPA (3-Year ICR)	380	\$40,508.86

Partner Survey Pretesting: The contractor will assist EPA in the development and deployment of the partner surveys and interviews in the pretesting process. To perform these functions, EPA will contract for a total of 90 professional hours in year 3. At an average rate of \$130.00 per hour, the total cost for the contractor is about \$11,700. Agency burden to manage this contract is estimated at 2 hours/month or 24 hours in year 3. Agency burden associated with the coordination and participation in pretesting interviews is estimated at 30 hours in year 3. The cost of this labor will be calculated based on a GS 13 Step 1 pay level (\$68.26/hour using the salary associated with this grade and step, multiplied by a benefits factor of 1.6). Total hours (54) amounts to a total agency labor cost of \$3,685.82 in year 3.

Agency Burden and Costs- Partner Survey		
	Burden Hours	Total Costs (\$)
EPA (Annual) – Year 3	144	\$15,385.82
EPA (3-Year ICR)	144	\$15,385.82

6(d) Estimating the Respondent Universe and Total Burden Costs

Registration

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
3,500 Educators	595	\$76.55	3,500	\$45,544.28

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
Total (Annual)	595		3,500	\$45,544.28
ICR Total (3 years)	1,785		10,500	\$136,632.83

Student and Teacher Surveys

(A) Number to be surveyed	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
1,000 Students per year	170	\$0.00	1,000	\$0.00
1,000 Educators – No student survey	333	\$76.55	1,000	\$25,515.00
300 Educators – Yes student survey	150	\$76.55	300	\$11,481.75
Average Total (Annual)	653		2300	\$36,996.75
ICR Total (3 years)	1,960		6,900	\$110,990.25

Teacher Interviews and Surveys

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
50 Educators	42	\$76.55	50	\$3,189.38
Total (Annual)	42		50	\$3,189.38
ICR Total (3 years)	125		150	\$9,568.13

Don't Fry Day Pledge

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
1,500 Educators	125	\$76.55	1500	\$9,568.13
Total (Annual)	125		1500	\$9,568.13

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
ICR Total (3 years)	375		4,500	\$28,704.38

Tutorial/Certificate

(A) Number to be surveyed	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
100 Students per year	12	\$0.00	100	\$0.00
1,500 Outdoor Educators	180	\$25.28	1,500	\$4,551.12
Average Total (Annual)	192		1,600	\$4,551.12
ICR Total (3 years)	576		4,800	\$13,653.36

Partner Surveys

(A) Number to register	(B) Total Hours	(C) Rate per hour (\$)	(D) # of responses	(E) Total Cost E=B*C
30 Partners	25	\$38.63	30	\$965.74
Total (Annual) - Year 3	25		30	\$965.74
ICR Total (3 years)	25		30	\$965.74

Total

ICR Total- Registration + Surveys + Tutorial + Interviews + Pledge (average annual)*	1,615		8,960	\$100,171.56
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ICR Total- Registration + Surveys + Tutorial + Interviews + Pledge (3 years)	4,846		26,880	\$300,514.67
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*Represents average annual cost, however not all activities will occur during all three years of the ICR, as described above.

6(e) Bottom Line Burden Hours and Cost Tables

Bottom Line Burden and Costs (3-Year ICR)		
	Burden Hours	Total Costs (\$)
Students	546	\$0.00
Educators	3,735	\$285,895.58
Outdoor Educators	540	\$13,653.36
Non-school Partners	25	\$965.74
EPA	8,798	\$431,134.11
Subtotal (respondents)	4,846	\$300,514.67
Subtotal (government)	8,798	\$431,134.11
Total	13,644	\$731,648.78

Bottom Line Burden and Costs (Average Annual)*		
	Burden Hours	Total Costs (\$)
Students	182	0
Educators	1245	\$95,298.53
Outdoor Educators	180	\$4,551.12
Partners	8	\$321.91
EPA	2933	\$143,711.37
Subtotal (respondents)	1,615	\$100,171.56
Subtotal (government)	2,933	\$143,711.37
Total	4,548	\$248,899.93

*Represents average annual cost, however not all activities will occur during all three years of the ICR, as described above.

6(f) Reasons for Change in Burden

There is a decrease of 195 hours annually in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. More hours were added for teachers participating in an individual interview. Hours were subtracted for teachers administering the student survey. Hours were added for teachers participating in the *Don't Fry Day* pledge. Hours and burden for educators is about the same; hours for students has also decreased significantly.

6(g) Burden Statement

The annual public reporting and record keeping burden for this collection of information is estimated to average 10 minutes per response for the registration, 10 minutes per response for the student survey, 20 minutes per response for the educator survey without the student survey, 30 minutes per response for the educator survey with the student survey, 50 minutes per response for the teacher interview with survey, 5 minutes per response for the *Don't Fry Day* pledge, 7 minutes per response for the certification tutorial program, and 50 minutes per response for pretesting the partner survey. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2007-0069, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2007-0069 and OMB Control Number 2060-0439 in any correspondence.