

OMB Clearance Justification
for
SuperTracker Information Collection for
Registration, Login, and
Food Intake and Physical Activity Assessment Information

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A. JUSTIFICATION

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

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

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

This is an extension, without change, of a currently approved collection (OMB Number 0584-0535, Expiration Date July 31, 2012). The U.S. Department of Agriculture (USDA), Center for Nutrition Policy and Promotion (CNPP) supports and promotes the health of all Americans by producing and promoting up-to-date science-based dietary guidance, including the Dietary Guidelines for Americans 2010 and MyPlate communications initiative. The Dietary Guidelines for Americans are the cornerstone of Federal nutrition policy for the general public, and they provide sound scientific advice for healthy Americans age 2 years and older about food choices that promote health and may prevent disease. CNPP has among its major functions the development and coordination of nutrition policy within USDA and the investigation of techniques for effective nutrition communication. Under Subtitle D of the National Agriculture Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3171-3175), the Secretary of Agriculture is required to develop and implement a national food and human nutrition research and extension program, including the development of techniques to assist consumers in selecting food that supplies a nutritionally adequate diet. Pursuant to 7 CFR 2.19(a)(3), the

Secretary of Agriculture has delegated authority to CNPP for, among other things, developing materials to aid the public in selecting food for good nutrition; coordinating nutrition education promotion and professional education projects with the Department; and consulting with the Federal and State agencies, the Congress, universities, and other public and private organizations and the general public regarding food consumption and dietary adequacy. The authority delegated to CNPP is presented in Appendix A.

b. Justification for Data Collection

CNPP maintains interactive tools that allow consumers to generate a daily food plan, analyze diet and physical activity, plan meals, and access food group and calorie information. Monitoring intake has been shown to help individuals become more aware of what and how much they eat and drink – the tools allow users to explore ways to improve their food and physical activity choices. As technologies change and improve, enhancements will be made to the online tools.

Consumers may voluntarily provide eating and physical activity data that can be retrieved by the user to assess individual history and behavior trends.

SuperTracker includes social media functionality that consumers may use at their discretion, including a journaling feature to capture information by category (Food(s) Eaten; Meal Location; Physical Activity; Mood; Notes), with the option to post to Facebook or Twitter. By leveraging the user’s existing social network the user is more likely to receive positive feedback and encouragement to support

individual dietary and/or physical activity goals. Social media functionality is provided as a consumer benefit – it does not impact consumer results or reports. SuperTracker users log in once to gain access to all features unlike the previous interactive tools provided by CNPP. A single registration/login save users substantial time resulting in decreased public burden. Revisions to CNPP interactive tools include the ability to:

- create profiles for each group member rather than separate user names and passwords for each consumer unit such as a family or wellness group.
- copy meals and/or physical activities to multiple days and/or multiple profiles. Users will be able to copy family meals to all (or some) members of the group simply by clicking checkboxes. .
- create “combos” for commonly eaten foods consisting of multiple food items.

SuperTracker’s streamlined navigation features allow consumers to quickly and easily enter data for one or multiple days,

Time needed per Response: Average duration = 15 Minutes.

Using Google statistics and assuming 11.2 million visits per year, the estimated average duration per visit is 15 minutes. This average accounts for the full spectrum of users, from those who use the application only once to repeat users who use some or all data entry options multiple times each day.

- 2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

SuperTracker can assist the public in making diet and physical activity choices.

Users voluntarily go to the ChooseMyPlate.gov web site to submit information.

The information obtained is stored in a user account maintained by USDA information technology (IT) staff. Only persons responsible for system maintenance, such as USDA information technology, contract, or CNPP staff, will have access to user technical information or usage metrics when necessary.

Neither CNPP nor FNS have access to user account information, including dietary or physical activity data created by the user. CNPP and FNS will not in any way use the data acquired, stored or generated by the user. CNPP may, however, uses web trend data or consumer feedback to make system improvements.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

Data collection is 100 percent electronic. The electronic transmission automatically stores an individual's user ID and masked password as well as food consumption, physical activity and assessment results when voluntarily entered.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no duplication involved in this process of collecting data. CNPP solely administers online dietary assessment activities. There are similar data collections, however; they do not meet our needs.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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

- 6. Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

The Dietary Guidelines for Americans is the cornerstone of Federal nutrition policy for the general public. The SuperTracker is based on the Dietary Guidelines and provides sound scientific advice for healthy Americans age 2 years and older. If the information is not collected, users will not be able to assess individual food intake and physical activity status. Users voluntarily enter information into the system. Therefore, the frequency of the data collection is

determined by the user. Inability to collect this information will diminish the public's ability to obtain personal diet and physical activity assessments based on the Dietary Guidelines for Americans and diminish the agency contribution to obesity and disease prevention initiatives.

7. **Explain any circumstances that would cause an information collection to be conducted in a manner:**
- **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.**

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

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

The 60-day notice for the “SuperTracker Information Collection for Registration, Login, and Food Intake and Physical Activity Assessment Information,” has been published on pages 13529-13530 in the Federal Register, Volume 77, No. 45.

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

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

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

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

9. Explain any decision to provide any payment of gift to respondents, other than reenumeration of contractors or grantees.

No payment or gift to respondents is being provided.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The USDA privacy page provides assurance to the public and appropriate contact information. The website information collected is voluntary in nature. No individual's name or response will be identified. The SuperTracker system entails Low to Minimal privacy risks. Each user has a unique username and masked password, and the system restricts users from viewing other individuals' accounts. The system utilizes security measures including system authentication, Secured Socket Layer (SSL), and role-based access. (Appendix B)

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

12. Provide estimates of the hour burden of the collection of information. The statement should:

- a. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

CNPP is not requesting a change to the burden inventory for OMB Number 0584-0535. The total number of respondents for this collection is expected to remain 3,787,898 for one time registration, login, and food intake and physical activity information.

The following total annual burden estimates are based on the data obtained from current web trends and the number of visits to the website, average time per visit.

- The number of annual visitors to the website is expected to be about 11.2 million.
- Approximately 30% of annual visitors will complete a one-time registration, log-in and assessment for the revised online assessment tool. This information is based on data from the previous, most frequently used, online tool, MyPyramid Tracker, a dietary assessment tool based on the 2005 Dietary Guidelines for Americans (rounded up = 3.3 million).
- The average number of weekly visitors is approximately 200,000.
- 30% of the weekly visitors return each week to complete tracking activities (approximately 60,000).

To use the SuperTracker, it will take individuals approximately 1 minute (.0167) to initially register for a system logon ID and password. It typically takes users 30 seconds (.0083) to routinely login to the system and approximately 15 minutes (.25) to complete food and physical activity data entry log for 1 day. Based on Google Analytics, repeat users will enter data on average 3 times per week. The amount of time spent completing entry and using expanded functionality is estimated at 45 minutes per week.

The annualized burden is estimated to be 3,787,898 hours.

b. Provide estimates of annualized cost to respondents for the hour burden for collections of information, identifying and using appropriate wage rate categories.

The minimum wage rate of \$7.25 per hour is used to calculate annualized costs for using SuperTracker. The estimated annualized cost to respondents is \$27,462,260.50.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There is no total annual cost burden to respondent of record keepers.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The estimated annualized cost to the Federal government is approximately \$2,105,346.00 This estimate is based on the following:

Annual server hosting and maintenance cost:	\$ 1,650,000.00
Two Federal employees (GS-11 and 13 @ 90% effort)	\$ 155,000.00
Contract Staff	\$ 300,000

Subtotal: \$2,105,000. 00

This represents a \$1,079,654 annual increase in server hosting and maintenance costs and additional federal and contract staff provided in the Change Justification submitted in May 2011 to support the SuperTracker application.

- 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, without change, of a currently approved collection (OMB Number 0584-0535, Expiration Date July 31, 2012). The currently approved burden hours, as of September 30, 2011, are 3,787,898. The burden inventory is estimated to remain unchanged

- 16. For collection of information whose results are planned to be published, outline plans for tabulation, and publication.**

There are no plans for statistical analyses in publications.

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

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

- 18. Explain each exception to the certification statement identified in Item "Certification for Paperwork Reduction Act."**

There are no exceptions to the certification statement being requested.