Science to Practice:

Perspectives of and Attitudes Towards a Marketing Strategy for Preventing Alcohol-related Problems in College Communities

CDC ID# 0920-12OG

SUPPORTING STATEMENT A

Submitted by:

Department of Health and Human Services

Center for Disease Control and Prevention

National Center for Injury Prevention and Control

Division of Unintentional Injury Prevention

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**A. Justification**

## A.1. Circumstances Making the Collection of Information Necessary

*Background*

The Centers for Disease Control and Prevention (CDC) requests a new information collection for a period of 18 months as part of the contract entitled, “Science to Practice: Developing and Testing a Marketing Strategy for Preventing Alcohol-related Problems in College Communities.”

The approach for developing and testing the marketing strategy is broadly based on work by the CDC (Sogolow, Sleet, & Saul, 2007), the NIH and health communication theorists such as (Maibach & Bloodgood, 2006) who promote using concepts from the marketing arena to gain wide adoption of evidence-based public health strategies.

This marketing strategy is being developed and tested for the prevention program, Safer Campuses and Communities (SCC). SCC combines alcohol management policies and enforcement with a publicity campaign targeting student drinking at private parties in residences, (including fraternity and sorority houses) in college communities. The program is based on previous work conducted by Pacific Institute for Research and Evaluation (PIRE) with funding from the National Institute for Alcohol Abuse and Alcoholism (NIAAA). PIRE designed the original prevention program, Safer California Universities, and tested it on 14 California university campuses and surrounding communities (Saltz et al., 2010). The Safer California Universities program reduced episodes of off-campus drinking and drinking and driving among students. Upon learning of the efficacious prevention program, CDC sought to collaborate with PIRE and NIAAA to design and test a strategy to adapt and market the program to universities and surrounding communities across the United States. Slight adaptions to the “Safer California Universities” program were made, and the program was renamed “Safer Campuses and Communities” (SCC) so that it could be marketed at the national level.

The entire marketing strategy is comprised of four phases. This Request for New Information Collection relates to the data collection necessary to implement Phase Four of the strategy. The four phases are:

1) Conduct focus groups understand how to best customize the Safer Campuses and Communities materials to appeal to different campus and community stakeholders who may lead the program (OMB #0920-0798);

2) Design a marketing strategy based on the results of the focus group sessions. A primary component of the strategy is a website that thoroughly describes the program and provides downloadable materials in the form of a “toolkit” and video testimonials from the professional staff at the campuses that have already implemented the program.

3) Execute the marketing strategy with a national sample of 160 4-year colleges and universities. The goal of the marketing strategy is to use an organic process to identify one or more champions at each campus, give them effective information and resources to encourage adoption of SCC, and then move a core group to action. To implement the strategy, a sample will be drawn from a database containing information on 384 colleges and universities from across the U.S., the Institutional Data Archive of American Higher Education (IDA).  University administrators and other campus stakeholders at the 160 sampled institutions will be contacted via email and introduced to the SCC program. The email will request that recipient both visit the SCC website to confirm their interest in reducing alcohol problems among their students and share the email with other campus and community stakeholders who are interested in reducing alcohol-related harms among students in their community. The recipients who go to the website and express their interest will constitute the key informants to be surveyed in Phase Four of the marketing strategy.

4) Evaluate the reach of and key informants’ response to the marketing strategy by conducting an online survey of the key informants described above in Phase Three. The survey is tentatively scheduled to be administered during the spring and fall semester of the 2013 and 2014 academic years. The primary goals of survey are to assess the level of interest in adoption of SCC and identify initial steps that have been taken to adopt the program.

The first two phases of the marketing have been completed. The final two phases will be completed upon approval of this Request for Information Collection. This request summarizes how the marketing strategy will be implemented (Phase Three) and details the Phase Four data collection activities.

The purpose of this Information Collection Request is to evaluate the reach of and key informants’ response to the marketing strategy for the Safer Campuses and Communities project.

The data collection in Phase Four is authorized under Section 301 of the Public Health Service Act (42 U.S.C. 241) (**Attachment A**). The marketing strategy is responsive to the National Center for Injury Prevention and Control’s (NCIPC) research priority to “Evaluate strategies to implement and disseminate known, effective interventions to reduce alcohol-impaired driving and test the effectiveness of new, innovative strategies.”

Rational for the need for Safer Campuses and Communities (SCC)

Each year, 1,700 college students die and more than 1.4 million are injured as a result of alcohol-related incidents. Despite the enormous public health burden of college-age alcohol misuse, there have been few rigorous evaluations of environmental strategies to address alcohol misuse in college settings. Environmental strategies typically involve implementing and enforcing policies that change the environments that influence alcohol-related behavior and subsequent harm. Such strategies require collaboration among various sectors of the college community including college administrators, college and community polices forces, and community stakeholders such as elected officials and community leaders. They are more time- and resource- intensive than more common but unproven approaches such as requiring all freshmen students to attend an alcohol education class. Further, studies show that the typical lag time between identifying effective interventions and obtaining widespread adoption can stretch to well over a decade (Balas & Noren, 2000). Given the number of students harmed, there is an urgent need to develop more efficient and timely strategies for moving effective science to widespread practice. To help address this need, CDC and NIAAA contracted the Pacific Institute for Research and Evaluation (PIRE) to develop and test the marketing strategy for the proven efficacious program Safer Campuses and Communities (SCC).

*Privacy Impact Assessment*

1. Overview of the Data Collection System

The Safer Campuses and Communities (SCC) program is designed to reduce intoxication and other alcohol-related harms associated with drinking in off-campus homes and apartments The Pacific Institute for Research Evaluation (PIRE) pioneered the program with funding from NIAAA. CDC and NIAAA are now funding PIRE to develop and test a national marketing strategy for SCC.

PIRE has subcontracted with the Silver Gate Group (SGG) to collaborate on portions of the project, including the data collection and analysis for Phase Four of the project, evaluating the reach (were appropriate campus and community members recruited through requesting that the campus officials share the email) of and response to the marketing strategy (did the respondent follow up by forwarding the email, printing materials from the website, meeting with a group to discuss adopting SCC, etc) (see Attachment C). SGG is a California-based organization that specializes in dissemination campaigns on issues related to public health and safety in colleges and universities.

SGG has access to the data base that will provide the sample of 160 colleges and universities that will participate in the evaluation of the marketing strategy. The data base, the Institutional Data Archive on American Higher Education (IDA), consists of data on 384 institutions of higher education drawn from 24 separate data sets. Further details about the IDA are supplied in Supporting Statement B. Briefly, the IDA data base includes information on administrators and key university staff members, including contact information, and census information surrounding the colleges and universities.

Phase Three: Execute the marketing strategy

Based on information obtained from focus groups conducted in Phase One and experience with implementing the Safer Californian Universities project, PIRE developed a marketing plan that has the following objectives:

* To maximize the chances of finding one or more “internal champions” for the intervention, understanding that that person may be a university staff/administrator, a city employee, a politician or a local community leader;
* To provide cogent and compelling information for that person or those persons so that they not only feel confident in advocating for the program, but also have materials to share with those they wish to recruit; and
* To overcome inertia by facilitating at least one meeting of interested parties at each targeted campus.

To meet these objectives, a random sample of 160 colleges and universities will be selected from the IDA; the sample will be restricted to 4-year schools with at least 5,000 undergraduates because schools with large number of undergraduates living in close proximity to the campus are thought to be the likeliest candidates for adopting SCC. Upon selection of the 160 schools, names and email addresses of key university administrators and staff (e.g., Dean of Students; Director of Health Services; campus police or security; Housing Director) from the selected schools will be extracted from the IDA. A colorful email will be sent to each person on the list that announces the availability of a tool kit and supporting materials for implementing SCC. A link to the SCC website will be provided along with a request that all interested recipients to click to the website to provide their emails. Most critically, the email will also ask the recipient to forward a copy of the email to person who they know have interest in or responsibility for the problems arising from student drinking in off-campus settings. The expectation is that this strategy will result in local elected officials, police, neighborhood leaders, local business people, or other unofficial but potentially critical supporters being identified.

Once the core group of people at each campus has identified themselves by their interest in the problem, PIRE will send a follow-up email with a more detailed description of the intervention, again, a link to the SCC website, and a request that PIRE would be able to share their contact information with others in their community. The request to share their information is tied to the last key objective. PIRE will send a contact list out to the self-identified core group and ask them to arrange a meeting among themselves to discuss the SCC program. The group will also be asked to identify a lead contact for PIRE, if possible. This will facilitate following up with either more information or to answer questions that may have arisen as the core group was meeting. The marketing campaign will be rolled out over a 6-month period of time so as to enable PIRE to make adjustments and improvements as necessary, and also to enable PIRE to best manage requests for information and our interaction in support of the core group meetings.

In sum, the marketing strategy is to use an organic process to identify one or more champions at each campus, give them effective information and resources to urge adoption of SCC, and then move a core group to action. This strategy is believed to be an innovation in comparison to a more passive distribution of materials only.

Phase Four: Evaluate the reach of and response to the marketing strategy

As described above, an initial group of campus administrators and staff, as well as city staff and officials from the selected schools will receive an email that will direct them to the SCC website and will also ask them to forward the email to individuals on or off campus who might be interested in participating and gaining more information.  A small mailing list will be built for each campus community, including internal champions, neighborhood association leadership, city officials, police departments, health services, etc. Approximately 6-12 people will be initially contacted on each campus. These individuals will constitute the key informants to be surveyed in Phase Four, the evaluation of the marketing strategy. Each key informant will receive an email invitation (Attachment F) to complete the online survey (Attachment C). Reminder emails will be sent to non-responders at 5, 9, and 14 day intervals after the initial invitation. The emails will include contact information for the survey staff for any individual who may wish to have more information about the survey. The emails will stress that participation is entirely voluntary, and individual questions can be skipped if desired (although the questionnaire will not include any items asking about personal behavior or any of a sensitive nature). Identifiers from the Institutional Data Archive on American Higher Education (IDA) will only be used to contact respondents by email.

1. Description of Information to be Collected

Information to be collected via the online survey (**Attachment C**) includes respondents’ perspectives and attitudes about the marketing strategy. Collected information includes respondents’ awareness of SCC and recall of the materials used to promote its adoption at campuses. Specifics about the respondents understanding of the program, attitudes and perceptions about the efficacy and benefits of the prevention strategies and the resilience of the current campus culture will also be collected on the survey. Individually identifiable information collected will be limited to the name, job title and email address of each individual identified in the Institutional Data Archive on American Higher Education (IDA).

**A.2. Purpose and Use of the Information Collection**

The primary purpose of this project is to test a marketing strategy that would encourage adoption of the SCC by colleges and universities throughout the U.S. Lenk and colleagues (2012) found that institutions of higher education were slow to adopt recommendations in a report on college student drinking by the National Institute on Alcohol Abuse and Alcoholism (2002). The content of the survey questionnaire is designed to follow the hypothesized steps that the respondents (key informants) may have taken in response to receiving the email message that introduced the Safer Campuses and Communities program. They will be asked if they remember receiving the invitation, whether they forwarded it to others, whether they saw value in the SCC website and materials supplied, what attitudes they have about SCC and their perception of support from others in their community. The items in the survey are also guided by theory of adoption and dissemination. Thus, the questionnaire includes items about the perceived “fit” of the program to the campus and the surrounding community, the perceived complexity and cost of the program.

They will also be able to look at various characteristics of the colleges and universities (e.g., public vs. private) and gain some insight into who may become a “champion” for the intervention, either by position (e.g., elected official) or by their perceptions or attitudes.

**A.2 Privacy Impact Assessment**

Identifiers provided from the IDA database will include name, title and email address. At no time will CDC have any access to identifiable data. PIRE will only provide summary data to CDC in the form of a final report. PIRE will not share any information obtained from the IDA with CDC. In order to characterize the composition of the respondents, the professional affiliations and characteristics of the colleges represented will be shared with CDC as part of the analysis performed for the summary report. The survey database of responses will use numerical identifiers and the contact information will be separated from the responses. Personal identifiers, including contact information will be stored in a separate database, which will be destroyed within 6 months of completing the survey. The de-identified response data will be maintained for 3 years after completion of the project.

Only persons who respond back to PIRE after receiving the marketing email in Phase 3 will be invited to complete the evaluation survey. The survey questionnaire will not ask respondents questions regarding personal behavior, only professional affiliation data will be collected; therefore the impact on respondent’s privacy will be minimal to none.

## A.3. Use of Improved Information Technology and Burden Reduction

Electronic emails will be used to inform key personnel at the campus and surrounding community of the SCC program, as well as provide a link to a website that gives more detailed information organized around the key issues that likely determine a school’s interest in the program (e.g., information on cost, complexity, impact, etc.). Finally, an online survey with these same key personnel will be conducted over the internet to further reduce the burden on subjects. All responses collected will be via the same electronic survey questionnaire (**Attachment C**). No aspect of the project will involve printed materials.

## A.4. Efforts to Identify Duplication and Use of Similar Information

Literature searches (conducted via PubMed, ISI Web of Knowledge and Google Scholar), and consultations with experts in college student drinking prevention and research indicates that there has been no study or data collection effort to determine the perspectives of different campus and community stakeholders with respect to the variety of barriers and challenges that colleges and universities may face as they consider adopting the SCC to reduce alcohol-related problems in their community.

**A.5. Impact on Small Businesses or Other Small Entities**

One target audience of the survey will be community leaders. Community leaders will comprise a mix of participants from both small and large sized organizations and businesses. The burden on community leaders representing small businesses or other small entities will be minimal.

## A.6. Consequences of Collecting the Information Less Frequently

All respondents in the online survey will be asked to provide information only once for this study. There is a need to develop more efficient and timely strategies for moving effective science to the widespread practice of preventing alcohol abuse on college campuses throughout the United States. The online survey will assess the reach of and response to the newly developed marketing materials, which may aid in the dissemination of a comprehensive environmental alcohol prevention program on college campuses. This work is essential toward meeting the goal of reducing intoxication, alcohol-impaired driving, and other alcohol harms among college students.

**A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

This request fully complies with the regulation 5 CFR 1320.5.

**A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency**

1. The 60-day Federal Register Notice was published in the Federal Register on July 24, 2012, vol. 77, No. 142; pp. 43287-88 (see **Attachment B**). One non-substantive public comment was received (See **Attachment D**). CDC’s standard response was sent.

1. Researchers familiar with college student prevention and translational research were consulted over a period from late 2011 through early 2012. Those experts included the following:

Robert Saltz, Ph.D.  
Prevention Research Center, PIRE  
510 883-5733  
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There were no significant problems in obtaining their judgment and advice concerning the proposed data collection.

**A.9. Explanation of Any Payment or Gift to Respondents.**

There will be no monetary incentive or payment to respondents. We will offer to send results of the survey to those who may be interested in receiving them.

**A.10. Assurance of Confidentiality Provided to Respondents.**

The Silver Gate Group will maintain the database containing names, positions, and addresses of participants and securely store the information gathered from the online survey. No identifiers will be stored with the survey data, and the (separate) database of contact information for survey participants will be destroyed six months after the survey has been completed. The de-identified response data will be maintained for 3 years after completion of the project.

While respondents will be known by name and email address in order to send them a link to the on-line survey questionnaire, the contact information will be kept separate from the responses to the questionnaire. It will not be possible to link a response to a subject’s identity from noting the department or agency they work in. None of the questions in the survey ask about the subject’s own personal behavior, so the risk of harm to respondents is very low.

Data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law. De-identified responses will be owned and stored by the Pacific Institute for Research and Evaluation (PIRE) and accessed only by the research staff assigned to this project. None of the staff will have access to the dataset that links responses to the contact information. Thus, it will be impossible for anyone at PIRE to know the identity of any specific respondent’s responses.

A copy of the Local IRB approval notice is included as **Attachment E**.

**A.10** **Privacy Impact Assessment Information**

A. This project is not subject to the Privacy Act. A system of records will not be maintained by the contractor beyond the life of the project.

B. Collected data will be stored on password-protected computers. The contractor and subcontractor will store personal identifiable information and response data in separate databases. No contact information will be transmitted to CDC. The file that links contact information to arbitrary identification numbers in the dataset of responses will only be available to the subcontractor (not to PIRE) and will be destroyed within 6 months of when data collection is complete.

C. Data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law

D. Respondents will be informed of the intended purpose of the collected data and assured that information will be treated in a secure manner. Respondents will also be informed of the voluntary nature of the study and their ability to withdraw from the study the study at any time. All respondents have a right to refuse to answer any questions contained in the survey (**Attachment F**).

E. Consent will not be sought for this study.

**A.11. Justification for Sensitive Questions**

The online survey does not contain questions of a sensitive nature.

**A.12. Estimates of Annualized Burden Hours and Cost**

This data collection for the evaluation of the marketing strategy involves an electronic online survey with reminders to non-respondents.

## The SCC marketing strategy recruits key informants who are interested in reducing alcohol-related harm among college students in their communities. To evaluate the reach of and response to the marketing strategy, individuals from 160 selected colleges and surrounding communities who expressed an interest in reducing alcohol-related harm in their community will be invited to complete an online survey.

## The respondents targeted are upper-level administrators such as vice-presidents; campus and municipal police, and community leaders. A maximum 12 individuals will be invited to participate from each of the 160 selected colleges or universities, with a maximum of 1800 total survey participants. Contacts will be limited to on-campus administrators, city officials, and community leaders. The amount of time required for a respondent to take part in the online survey is estimated to be 20 minutes.

## A.12.A. Burden

Table A.12- Estimate of Annual Burden Hours.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Type of Respondent | Form Name | Number of Respondents | Number of Responses per Respondent | Average Burden per Respondent (in hours) | Total Burden Hours |
| College Administrator | CDC Questionnaire (Attachment C) | 600 | 1 | 20/60 | 200 |
| Police officer | CDC Questionnaire (Attachment C) | 600 | 1 | 20/60 | 200 |
| Community Leader | CDC Questionnaire (Attachment C) | 600 | 1 | 20/60 | 200 |
| Total burden hours | -- |  |  |  | 600 |

A.12.B. Estimated Annualized Burden Cost

In total, we expect that 600 college administrators, 600 police officers, and 600 community leaders will complete the online survey, resulting in a burden of 600 hours. Hourly wages are estimated to be as follows: college administrators ($44.00), police officers ($38.00), and community leaders ($24.00), resulting in a total respondent cost of $21,200. The total estimated annualized cost is $61,517. Our calculations were made based on the average hourly wage rates presented in Table A.12.B. Source: Bureau of Labor Statistics, U.S. Department of Labor, May 2012 http://www.bls.gov/oes/oes\_data.htm

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Type of Respondent | Form Name | Total Burden Hours | Hourly Wage Rate | Total Respondent Cost |
| College Administrator | CDC Questionnaire (Attachment C) | 200 | $44.00 | $8,800 |
| Police Officer | CDC Questionnaire (Attachment C) | 200 | $38.00 | $7,600 |
| Community Leader | CDC Questionnaire (Attachment C) | 200 | $24.00 | $4,800 |
| Total burden cost | CDC Questionnaire (Attachment C) |  |  | $21,200 |

**A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record keepers.**

There are no costs to respondents other than their time for participating in the online survey.

**A.14. Annualized Cost to the Government.**

The one-time cost for the online survey includes web page development, instrument design and implementation, data collection, data analysis and reporting. Web page development, instrument design, data analysis and reporting will be implemented by PIRE and overseen by CDC. Data collection will be accomplished via the website maintained by the Silver Gate Group and overseen by PIRE and the CDC technical monitor. The online survey and analyses will be conducted over the next 12 months following the OMB review. The costs to the government include the costs of the contractor, the CDC Technical Monitor and the CDC Project Officer, both of whom will oversee the contractor’s efforts. The estimated costs reflect the costs outlined in the contractor’s budget and 48 hours of a CDC FTE (average grade 13/15) for oversight of the data collection. The costs are as follows:

Table A.14A. Annualized Cost (one-time data collection from online survey responses)

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
|  | Hours | Hourly Rate | Cost at Hourly Rate | Other Costs | Total |
| Silver Gate Group | 550 | $71.44 | $39,292 | $3,426 | $42,718 |
| PIRE Project Director | 120 | $84.15 | $10,098 | $6,221 | $16,319 |
| PIRE Research Associate | 35 | $25.00 | $875 | $0 | $875 |
| PIRE Program Director | 35 | $45.85 | $1,605 | $0 | $1,605 |
| CDC FTE | 48 | $55 | $2,640 | N/A | N/A |
| Total | 788 | -- | $54,510 | $9,647 | $61,517 |

## A.15. Explanation for Program Changes or Adjustments

This is a new data collection.

**A.16. Plans for Tabulation and Publication and Project Time Schedule.**

###### A.16.A. Tabulation and Analysis Plan

The analyses of the survey data will provide information that may determine where, along the hypothesized sequence of steps to adoption, the marketing strategy may have succeeded or failed. PIRE will also be able to look at various characteristics of the campuses (e.g. public vs. private) that may influence adoption. Finally, they hope to gain some insight into who may become a “champion” for the intervention, either by position (e.g., elected official) or by their perception or attitudes.

After an inspection of response patterns to identify errors in coding or file creation, the substantive questions will be addressed through a set of regression analyses. A preliminary model will be built to identify the type of respondent most likely to be a “champion” of the intervention. PIRE is specifically interested in which departments may be most or least favorable to the intervention, but whether non-college respondents may have a greater interest in the intervention than college/university staff. The model would look for respondent characteristics that would predict more favorable attitudes toward the intervention.

Table A.16-A 1. Time Schedule

|  |  |
| --- | --- |
| Month 1-2 after OMB approval | Launch emails to random subset of 12 IHEs. Follow up as needed. |
| Months 2-4 after OMB approval | Launch emails to 50 campuses. |
| Months 4-6 after OMB approval | Launch remaining emails (N=98).  Conduct evaluation survey with first set two sets of IHEs (N=62). |
| Months 7-9 after OMB approval | Conduct evaluation survey with remaining campuses. |
| Months 9-18 after OMB approval | Conduct analysis of entire survey data and write evaluation report. |

CDC is requesting an 18-month OMB Approval.

**A.17. Reason(s) Display of OMB Expiration Date is Inappropriate**

The display of the OMB expiration date is not inappropriate.

**A.18. Exceptions to Certification for Paperwork Reduction Act Submissions.**

There are no exceptions to the certification.

References

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