OMB Clearance Application:

*Let’s Move!* Cities, Towns and Counties Baseline Survey

***Office of the Assistant Secretary for Health***

***May 10, 2015***

**TABLE OF CONTENTS**

a. Justification 1

1. Circumstances Making the Collection of Information Necessary 1

2. Purpose and Use of Information Collection 1

3. Use of Improved Information Technology and Burden Reduction 2

4. Efforts to Identify Duplication and Use of Similar Information 2

5. Impact on Small Businesses or other Small Entities 2

6. Consequences of Collecting Data Less Frequently 2

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5 2

8. Comments in Response to Federal Register Notice/ Outside Consultation 3

9. Payments/Gifts to Respondents 3

10. Assurance of Confidentiality 3

11. Questions of a Sensitive Nature 4

12. Estimates of Annualized Hour and Cost Burden 4

13. Estimates of Other Annualized Cost Burden to Respondents 4

14. Estimates of Annualized Cost to the Government 4

15. Program Changes 5

16. Time Schedule, Publication and Analysis Plans 5

B. Collections of Information Employing Statistical Methods 6

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# a. Justification

## Circumstances Making the Collection of Information Necessary

The Office of the Assistant Secretary for Health (OASH) is requesting an extension of approval from the Office of Management and Budget (OMB) to collect information from public and private sector organizations for the *Let’s Move!* Cities, Towns and Counties through a participant survey (OMB #0990-0388). An emergency approval was granted in January of 2012, and a subsequent approval in fall of 2012, and this information collection request is a continuation for a standard three-year approval. *Let’s Move!* is a comprehensive initiative, launched by the First Lady, dedicated to solving the challenge of childhood obesity within a generation.

*Let’s Move!* Cities, Towns and Counties (LMCTC) calls on local elected officials to adopt long-term, sustainable, and holistic approaches to addressing childhood obesity. Local elected officials who sign up for the initiative are willing to commit to five goals that are intended to create healthier, more livable communities. LMCTC emphasizes the unique ability of communities to address the challenge of childhood obesity locally, and the critical leadership mayors and local officials can provide to bring communities together and spur action

The survey requests information about the activities the locality is choosing to undertake. The responses to these questions are used to show progress and success over time for sites participating in *Let’s Move!* Cities, Towns, and Counties, and is the mechanism by which sites are recognized for their success. In addition, the survey responses inform how HHS can adjust its technical assistance in response to sites’ progress. This initiative was first launched in 2010, then was revised and relaunched in July 2012.

The following subsections of this document provide a detailed justification of the baseline survey in accordance with OMB requirements.

This collection of data is authorized by Section 301 of the U.S Public Health Service Act (42 U.S.C.241). A copy of this legislation can be found in Appendix 1.

## Purpose and Use of Information Collection

*Let’s Move!* Cities, Towns and Counties is designed to encourage mayors and local officials to adopt a long-term, sustainable and holistic approach to addressing childhood obesity. The initiative recognizes that every city is different, and every town will require a distinct approach to the issue. *Let’s Move!* Cities, Towns and Counties is working collaboratively with the National League of Cities to field the survey. The National League of Cities manages the information and provides technical assistance to sites that may require help in completing the survey. To participate, a mayor or local official can sign up his or her jurisdiction to the initiative. During this process, the local official or their designate fill out the baseline survey where he or she commits to five goal areas intended to create healthier, more livable communities. The goals include actions from each of the *Let’s Move!* pillars, which are::

1. Helping early care and education program providers incorporate best practices for nutrition, physical activity and screen time into their programs;
2. Prominently displaying MyPlate in all municipally- or county-owned or operated venues that offer or sell food/beverages;
3. Expanding access to meal programs before, during and after the school day, and/or over the summer months;
4. Implementing healthy and sustainable food service guidelines that are aligned with the Dietary Guidelines for Americans in all municipally- or county-owned or operated venues that offer or sell food/beverages;
5. Mapping local playspaces, completing a needs assessment, developing an action plan, and launching a minimum of three recommended policies, programs or initiatives aimed at increasing access to play.

Local officials are then asked to begin to envision how to address this issue in their communities.  Once the baseline survey has been, submitted technical assistance resources are made available to the *Let’s Move!* Cities, Towns and Counties for successful achievement of each of the five actions.

Once local officials commit, they may update the survey when they have made progress against any of the goal areas. Local officials may be recognized in the following ways:

* *Let’s Move!* representatives will seek out cities and towns with successful initiatives to highlight and celebrate.
* Accomplishments and ideas for future action may be highlighted on the *Let’s Move!* website.
* Local elected officials from high-achieving *Let’s Move!* Cities, Towns and Counties sites may be invited to attend events to celebrate collective success in combating childhood obesity.

The online survey used for baseline assessment and follow-up is used to determine progress on participants’ chosen activities, technical assistance needs, geographic distribution of participating local officials, in addition to any barriers or facilitators to their work that should be examined, and successes.

## Use of Improved Information Technology and Burden Reduction

To expedite and standardize data collection, the survey is administered online through the *Let’s Move!* Cities, Towns and Counties website.

## Efforts to Identify Duplication and Use of Similar Information

There are no other data collection activities collecting information for the *Let’s Move!* Cities, Towns and Counties initiative. The information we are requesting to collect is not available elsewhere.

## Impact on Small Businesses or other Small Entities

The survey will have minimal impact on small entities as only one individual per organization or municipality will fill out the survey. Further, completion of the survey will require minimal time out of the individual’s workday to complete.

## Consequences of Collecting Data Less Frequently

The design of this survey requires only one data collection activity per participant at baseline and periodic follow-ups. Without collecting this data, HHS will not be able to identify and adequately assess who is participating in LMCTC and which activities and strategies they have agreed to implement, which is essential in showing progress and determining geographic areas for outreach and technical assistance needs and to recognize successful implementation of the *Let’s Move*! programs. In addition, collecting this information will assist in disseminating promising practices to ultimately increase the number and diversity of individuals, organizations, and groups that are addressing the LMCTC activities and strategies within communities.

## Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

This request is consistent with the general information collection guidelines of 5 CFR 1320.5(d)(2).

## Comments in Response to Federal Register Notice/ Outside Consultation

A notice in the *Federal Register* was published on March 4, 2015 (Vol. 80, No. 42 pg 11675). No comments were received. HHS staff and advisors consulted in the development of this project include:

* Robin McKinnon PhD (OASH/HHS)
* Amanda Cash, DrPH (Office of the Assistant Secretary for Planning and Evaluation (ASPE)/HHS)

## Payments/Gifts to Respondents

There will be no payments or gifts to respondents.

## Assurance of Confidentiality

Information that is personally identifiable will not be collected. The only information that will be collected is the contact information for the individual filling out the survey on their municipality or community’s behalf. Any information obtained on the survey will be kept private to the extent allowed by law. Information provided may be used to identify and adequately assess who is participating in LMCTC and which activities and strategies they have agreed to implement, which is essential in showing progress and determining geographic areas for outreach and technical assistance needs. Information collected through the survey will assist in disseminating promising practices to ultimately increase the number and diversity of individuals, organizations, and groups that are addressing the LMCTC activities and strategies within communities. Participants will be informed in the instructions for the survey that the information provided in the survey will be used for the purpose of tracking progress of the LMCTC and disseminating promising practices to ultimately increase the number and diversity of individuals, organizations, and groups that are addressing the LMCTC activities and strategies within communities. Promising practices may be publicly highlighted and celebrated in public forums, posted on the the *Let’s Move!* Website or annual reports. In addition, the organization information as well as the name of a contact person may be made available on the *Let’s Move!* website for replication purposes.

## Questions of a Sensitive Nature

The application will not include any questions of a sensitive or personal nature. Respondents will be asked questions regarding their municipality or community, and information related to which activities the municipality chooses to implement. The questions are designed to solicit information solely regarding the activities the municipality or community chooses to implement.

## Estimates of Annualized Hour and Cost Burden

In Exhibit 1 and 2, we provide estimates of the collection burden on applicants for this effort. Applicants will participate in data collection one time only, responding via an online survey. Hour burden estimates were determined based on similar surveys used in other HHS programs.

Exhibit 1. Estimate Annualized Time Burden to Respondents

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| ***Type of Respondent*** | ***Form*** | ***Estimated # of Respondents*** | ***Responses per Respondent*** | ***Hours per Response*** | ***Estimated Total Burden Hours*** |
| Government Official (city, town, county) | Baseline Survey | 500 | 1 | 30/60 | 250 |

Exhibit 2. Estimate of Cost Burden to Respondents

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| ***Type of Respondent*** | ***Estimated # of Respondents*** | ***Total Burden Hours*** | ***Average Hourly Wage Rate*** | ***Total Cost Burden*** |
| Government Official (city, town, county) | 500 | 250 | $28.83\* | $7,207.50 |

\*Based on hourly wage for Social and Community Service Managers, U.S. Department of Labor, Bureau of Labor Statistics. Extracted April 28, 2015, from [www.bls.gov](http://www.bls.gov).

## Estimates of Other Annualized Cost Burden to Respondents

Information collected for the baseline survey for LMCTC will not result in any additional capital, start-up, maintenance, or purchase costs to respondents or record keepers.

## Estimates of Annualized Cost to the Government

The majority of costs related to the survey are personnel costs of several federal employees involved in the oversight, and analysis of information collection, amounting to an annualized cost of $25,417 for Federal labor.

## Program Changes

Since the initial OMB approval for this request in 2012, there has been a change to the estimated number of survey respondents (reduced from 1000 to 500) and to the time taken to complete the survey (increased from 15 minutes to 30 minutes), but not to the overall burden hours, which remains the same at 250 hours. These changes reflect that the initial approval request was submitted before the launch of the *Let’s Move!* Cities, Towns and Counties initiative. There is now almost 3 years of experience with the initiative, and data from the survey specifically. As of May 10, 2015, 473 sites participate in the initiative and we expect that by December 31, 2015 that number will be approximately 500. We understand from sites that the average time to complete the survey is closer to 30 minutes rather than the previously estimated 15, and that each site updates the survey an average of once per year.

## Time Schedule, Publication and Analysis Plans

The information collected in the survey will be used to determine which municipalities signed up for LMCTC, and which activities and strategies they choose to implement. In order to present a coherent plan, this section presents a brief overview of the study purpose, selection process, and the time schedule for completing the project, including dissemination of information.

As a part of the LMCTC process, interested municipalities and communities will sign up to participate in LMCTC by completing an online survey that asks several questions related to their municipality and the strategies and activities they choose to implement. The responses to these questions will be used to determine technical assistance needs, outreach and follow-up information, and the proportion of municipalities who chose to implement each activity or strategy. The activities and strategies fall into the following categories:

* Implementing best practices in nutrition, physical activity and screen time in child care settings;
* My Plate promotion in city and municipal venues;
* Increasing the number of students with access to meal programs before, during and after school day, and over the summer months;
* Adopting healthy and sustainable food service guidelines for municipal and county locations that serve food; and
* Increasing access to play spaces in neighborhoods, schools and through community engagement.

Information will be collected following OMB approval, and will be ongoing as municipalities choose to sign up for LMCTC. Exhibit 3 provides a schedule of data collection, and future plans for follow-up survey collection, and announcement following OMB approval.

Exhibit 3. Timetable for Data Collection

|  |  |
| --- | --- |
| ***Activity*** | ***Expected Date of Completion*** |
| Complete Development of Website | Complete |
| Survey fielded (data collection) | Ongoing |
| New OMB ICR submitted for follow-up surveys | 1 month following OMB approval |
| Announcement of municipalities and counties signed up | Rotating |

1. ***Approval not to Display the Expiration Date for OMB approval***

OASH does not seek this exemption.

1. ***Exception to Certification Statement***

There are no exceptions to the certification statement.