

**Supporting Statement for
SuperTracker Information Collection for Registration, Login, & Food Intake and
Physical Activity Assessment**

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Supporting Statement – Part A

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.

This is an extension, without change, of a currently approved collection (OMB Number 0584-0535, Expiration Date September 30, 2015). 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 nutrition guidance. 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.

One of the primary ways CNPP helps Americans apply the nutrition recommendations in to their daily lives is by developing and maintaining interactive tools. CNPP’s web-based interactive tools provide hands-on learning opportunities that empower Americans to think critically about their food and physical activity choices. Maintaining and enhancing CNPP’s interactive tools is key in reversing the trend of childhood obesity and building a healthier next generation.

SuperTracker is CNPP’s food, physical activity, and weight tracking tool originally launched in December 2011 and available at www.SuperTracker.usda.gov. Available on desktop, mobile, and tablet, SuperTracker empowers its users to identify how their own diet and activity compare to personalized. Monitoring intake has been shown to help individuals become more aware of what and how much they eat and drink. SuperTracker supports users in setting and achieving personal goals for their health and wellness.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

SuperTracker can assist the public in making diet and physical activity choices. Users voluntarily go to the website and voluntarily submit information to assist them in creating a dietary plan and tracking their foods, physical activities, and weight. Please see Appendix A for screenshots. Users are not required to enter any of the information described below to use SuperTracker. They can enter as much or as little as desired. They may also choose how often to use the tool (e.g. one time only, daily, weekly, etc.).

Create Profile

SuperTracker users may voluntarily provide profile information, including profile name (this is a display name for the profile such as “mom” and is NOT the user’s legal name), age, gender, height, weight, physical activity level, and pregnancy/breastfeeding status in order to get a personalized food and physical plan. Or they can choose not to provide this information and use a general 2000 calorie plan instead. They may also choose to register their profile by creating a username, password, password hint, password security question, and email address (optional). Registration is voluntary but is required to save data over time.

Food Tracker

If desired, users can use the Food Tracker page to track the foods and beverages they consume. They first search for the foods/beverages in the SuperTracker database, then indicate the amount consumed, and lastly add to a meal.

Physical Activity Tracker

If desired, users can use the Physical Activity Tracker page to track their physical activities. They first search for the activities in the SuperTracker database, then indicate the duration, and lastly add to a day of the week (e.g. 30 minutes of running on Tuesday).

My Weight Manager

If desired, users can use the My Weight Manager page to track their weight over time.

My Journal

If desired, users can use the My Journal feature to capture information by category (Food(s) Eaten; Meal Location; Physical Activity; Mood; Notes), with the option to post the Notes section to Facebook or Twitter. The social media functionality is provided as a consumer benefit – 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.

Create Group (to be available fall 2015)

A new SuperTracker feature called user groups is currently under development and planned for launch in fall 2015. Users will have the option to create a group and invite members to join the group. Group members will have the option to allow the group leader to view some of their information (i.e. foods and beverages tracked, physical activities tracked, weight tracked, and profile information) if desired. Participation in user groups is voluntary, and this feature is not anticipated to increase public burden. The feature is being offered in direct response to user feedback and requests from educators and health professionals using SuperTracker with students and clients. When creating a group, users will provide the group name, group leader display name, and group description. They also have the option to provide an organization name if desired (e.g. a school or health care facility).

All of the information described above is stored on SuperTracker backend servers so that it may be retrieved by the user as needed to assess personal dietary intake history and behavior trends. Once the user group enhancement is released, group leaders will also be able to access information from group members who have authorized the group leader to view their food and physical activity data (not PII).

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, have access to stored user information and usage metrics. CNPP does not have access to personally identifiable user information and has no way of linking SuperTracker information with a specific individual.

SuperTracker backend data is only used to identify overall trends in usage in order to make system improvements. For example, CNPP has reviewed backend metrics to determine how many profiles belong to school-aged children. As a result of this information, CNPP decided to create SuperTracker Nutrition Lesson Plans for High School Students to better serve this audience. CNPP may also review de-identified, aggregated data to identify trends that can inform system improvements to best support users in achieving their health and wellness goals by understanding how using specific site features may be associated with reaching goals.

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. Users who choose to create registered accounts have all profile, food, physical activity, and weight information automatically saved to their accounts electronically and can access it any time.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

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 (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Information being requested or required has been held to the minimum required for the intended use. No small entities are impacted by this collection of information.

6. Describe the consequence 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 SuperTracker is based on up-to-date science-based nutrition guidance 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 against national nutrition recommendations. 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 up-to-date science-based nutrition guidance and diminish the agency contribution to obesity and disease prevention initiatives.

7. Explain any special 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, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

A 60-day notice for the “SuperTracker Information Collection for Registration, Login, and Food Intake and Physical Activity Assessment Information,” notice was published in the Federal Register on April 2, 2015, Volume 80, pages 17714 -17715

(<https://www.federalregister.gov/articles/2015/04/02/2015-07592/agency-information-collection-activities-proposed-collection-comment-request-supertracker>). No

information collection related comments were received.

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 nutrition guidance. 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 or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents.

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

SuperTracker includes a link to the USDA privacy policy (provided in Appendix B), which 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. The system utilizes security measures including system authentication, Secured Socket Layer (SSL), and role-based access.

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. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

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 annual burden estimates for respondents in this collection is

expected to remain 3,787,898 for one time registration, login, and food intake and physical activity information.

The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden are shown in the attached Burden Table (Appendix C). A summary of the burden appears below:

The following total annual burden estimates are based on the data obtained from current web trend tool, Google Analytics from January 2012—January 2015.

- The number of annual visitors to the Web site is expected to be about 11.2 million and they will spend approximately 5 minutes one time only.
- Approximately 30 percent 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 Google Analytics (rounded up = 3.3 million).
- The average number of weekly visitors is approximately 200,000.
- 30 percent of the weekly visitors return each week to complete tracking activities (approximately 60,000).

Estimated Number of Responses per Respondent: 4.5

Estimated Total Annual Responses: 16,020,000

Estimated Time per Response: 0.236448065

For 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. Repeat users will enter data on average 3 times per week. The amount of time spent completing entry and using functionality is estimated at 45 minutes per week.

Estimated Total Annual Burden on Respondents: 3,787,898 hours.

B. Provide estimates of annualized cost to respondents for the hour burdens 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 calculated as follows:

TOTAL COST TO THE PUBLIC = 3,787,898 hours X \$7.25 = \$27,462,260.50

13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 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 are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. 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 \$2,218,357.35.

This estimate is based on the following:

Annual server hosting and maintenance cost:	\$1,678,357.35
Two Federal employees (GS-13 @90% and 14 @ 33% effort)	\$ 110,000.00
Contract Staff	\$ 430,000
<hr/>	
Subtotal:	\$2,218,357.35

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, for a currently approved data collection. There are no changes to the information collection since the last OMB approval.

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

CNPP and/or those working for CNPP may publish observations identifying relationships between usage trends and achieving health and wellness goals (e.g. using specific site features may be associated with reaching goals) using de-identified data.

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

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 19 of the OMB 83-I “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I. There are no exceptions to the certification statement being requested.