

Supporting Statement for Request for Clearance:  
Prevention Communication Formative Research

OMB No. 0990-0281

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SUPPORTING STATEMENT  
PREVENTION COMMUNICATION FORMATIVE RESEARCH

This is a revision of an approved collection of information (OMB No. 0990-0281). According to OMB guidance regarding generic clearance, individual memos explaining the exact methods for information collection will be submitted for each study under this clearance.

Changes in this request include updated national hourly wage and minor changes to data collection activities and related burden hours in order to meet the needs of the initiatives mentioned below. This request builds on previous formative research approaches to place more emphasis on Web-based data collection to allow greater geographical diversity among respondents, to decrease respondent burden, and to save government costs.

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

The Office of Disease Prevention and Health Promotion (ODPHP), located in the Office of the Assistant Secretary for Health at the U.S. Department of Health and Human Services (HHS), was established by Congress to provide a central focus for stimulating and coordinating federal activities in prevention (Public Law 94-317, National Consumer Health Information and Health Promotion Act of 1976, Section 207, Section 7). This focus includes developing and disseminating prevention information to the public. Recent advances in information and communication technologies provide new opportunities for ODPHP to more effectively reach its intended professional and consumer audiences with key information, interactive tools and recommendations about disease prevention, and health promotion, including the benefits of healthy eating, increased physical activity, and patient safety.

ODPHP's new opportunities occur against a backdrop of increasingly urgent interest in finding effective ways to communicate health information to America's diverse population. As a federal government agency, ODPHP strives to be responsive to the needs of America's diverse audiences while simultaneously serving all Americans across a range of channels, from print through new communication technologies. To carry out its prevention information mandate, ODPHP is committed to conducting formative and usability research to provide guidance on the development and implementation of its disease prevention and health promotion communication and education efforts. This generic clearance request describes data collection activities involving methods such as: individual interviews, focus groups, Web-based surveys, card sorting and various forms of usability testing to establish a deeper understanding of the interests and needs of consumers and health professionals for disease prevention and health promotion information and tools.

## 2. Purpose and Use of Information Collection

This generic clearance request is for a revision to the use of the approved information collection assigned OMB control number 0990-0281. The request describes data collection activities by ODPHP and its contractors involving a limited set of research activities with consumers and health professionals to better understand their needs and preferences related to disease prevention and health promotion information and initiatives. Specifically, ODPHP will use the information collected to improve its communication, products, and services that support key office activities including: Healthy People, Dietary Guidelines for Americans, Physical Activity Guidelines for Americans, healthfinder.gov, and increasing health care quality and patient safety. ODPHP communicates through its websites ([www.healthfinder.gov](http://www.healthfinder.gov), [www.HealthyPeople.gov](http://www.HealthyPeople.gov), [www.health.gov](http://www.health.gov)) and through other channels including social media, print materials, interactive training modules, and reports.

The primary methods of data collection will be qualitative and may include in-depth interviews, focus groups, Web-based surveys, card sorting, and various forms of usability testing of materials and interactive tools to assess the public's understanding of disease prevention and health promotion content, responses to prototype materials, and barriers to effective use.

The research methods outlined in this supporting statement have five major purposes:

1. To obtain useful target audience information for the formation of messages and materials
2. To further explore messages and materials in contexts that would be most beneficial for target audiences
3. To identify and verify audience segmentation strategies for providing disease prevention and health promotion information
4. To inform the development and refinement of user-friendly websites and other interactive tools
5. To identify user challenges and obstacles to accessing health information to guide website, material, and interactive tool development and refinement

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

Remote and Web-based testing is a cost-efficient method to obtain quantitative and qualitative input from a greater number of participants who are more representative of the U.S. population. Below is a description of how ODPHP will use technology, when possible, to reduce response burden.

**Interviews and focus groups** are recorded so that written transcripts of the interviews are available for review. Remote interviews and focus groups may be conducted by telephone or through Web conferencing software.

**Web-based surveys** may be conducted among visitors to HealthyPeople.gov, healthfinder.gov, health.gov, or through an already existing survey tool (e.g., Qualtrics).

**Card sorting** is a common method for gaining insights from participants on how to effectively organize a website or online application. In-person card sorting is typically conducted in a one-on-one interview setting with a moderator and note taker. Web-based card sorting allows participants to use a “drag-and-drop” online interface to perform an un-moderated card sort on their own time.

**Usability testing** can be conducted either in person or remotely using Web conferencing software. The participant’s screen and voice are typically recorded during both in-person and remote sessions so they can be reviewed later for reporting purposes. Usability testing also includes online methods such as tree testing and click testing.

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

It is not expected that any of the information to be submitted to ODPHP during these formative research studies is duplicative or is already in the possession of the Federal government. The proposed generic research will allow ODPHP to significantly improve its ability to develop and refine messages, materials, websites, and interactive tools that will be used by multiple agencies within HHS.

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

Not applicable.

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

If this information is not collected, ODPHP’s ability to effectively communicate disease prevention and health promotion information to the American public will be compromised. Relatively little is currently known, for example, about how to present messages in ways that can maximize how individuals with low health literacy can easily access and comprehend vitally important information about how to protect and promote their health. In addition, the emergence of new technologies requires that we do prototype testing in order to ensure that technology-based information and tools are easy for the public to use.

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

Various data collection activities may be conducted under the auspices of this request. Each activity is anticipated to be a one-time collection. This request fully complies with regulations.

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

A 60-day Federal Register notice was published in the Federal Register on July 10, 2015, Volume 80, Number 132, Pages 39783-39784. There were no comments received.

## 9. Explanation of Any Payment or Gift to Respondent

A small cash stipend intended to reimburse for expenses such as transportation and childcare costs may be given to research participants. Amounts and justifications will be determined on an individual project basis. This information will be included in the memo provided to OMB for each formative input session to be conducted.

## 10. Information Regarding Confidentiality Provided to Respondents

ODPHP and its contractors will follow procedures for maintaining privacy to the extent allowed by law during all stages of data collection. Respondents will receive information about privacy in an advance letter and again before the information collection sessions begin. Respondents will be informed that all information will be kept private by the research team and that their comments will not be associated with their names.

Respondents in focus-group sessions will not know each other and will be asked to introduce themselves by first name only. The focus-group sessions will be in a room with a closed door so passersby cannot overhear the discussion. In-person research sessions will be scheduled to allow more than enough time between sessions to avoid respondents in different groups seeing each other. All in-person testing will be conducted in a private setting.

At the beginning of each testing session, the facilitator will explain that the respondents' names and addresses will not be associated with the formative input session results.

## 11. Justification for Sensitive Questions

No questions will be asked that are of a personal or sensitive nature.

## 12. Estimates of Annualized Burden Hours and Cost

### A. Burden Hours

The total annual estimated burden imposed by this collection of information is 1,497.5 hours for a total of 4,492.5 total hours over a 3-year period.

Data Collection Task	Instrument/ Form Name	# of Respondents	# Responses/ respondent	Average Burden/ Response (in hours)	Total Response Burden (in hours)
In-depth interviews	Screeners	135	1	10/60	22.5
	Interview	45	1	1	45
Focus groups	Screeners	240	1	10/60	40

<b>Data Collection Task</b>	<b>Instrument/ Form Name</b>	<b># of Respondents</b>	<b># Responses/ respondent</b>	<b>Average Burden/ Response (in hours)</b>	<b>Total Response Burden (in hours)</b>
	Focus Group	80	1	1.5	120
Web-based surveys	Screeners	6000	1	5/60	500
	Survey	2000	1	15/60	500
Card sorting	Screeners	180	1	10/60	30
	Card Sort	60	1	1	60
Usability and prototype testing of materials (print and Web)	Screeners	360	1	10/60	60
	Usability Test	120	1	1	120
<b>TOTAL</b>					<b>1,497.50</b>

**B. Burden Cost (average hourly rate)**

<b>Data Collection Task</b>	<b>Instrument/ Form Name</b>	<b>Response Burden (in hours)</b>	<b>Hourly Wage Rate</b>	<b>Respondent Cost</b>
In-depth interviews	Screeners	22.5	\$22.71	\$510.98
	Interview	45	\$22.71	\$1,021.95
Focus groups	Screeners	40	\$22.71	\$908.40
	Focus Group	120	\$22.71	\$2,725.20
Web-based surveys	Screeners	500	\$22.71	\$11,355.00
	Survey	500	\$22.71	\$11,355.00
Card sorting	Screeners	30	\$22.71	\$681.30
	Card Sort	60	\$22.71	\$1,362.60
Usability and prototype testing of materials (print and Web)	Screeners	60	\$22.71	\$1,362.60
	Usability Test	120	\$22.71	\$2,725.20
<b>TOTAL</b>				<b>\$34,008.23</b>

The \$22.71 hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2014 report “National Occupational Employment and Wage Estimates United States.” See [http://www.bls.gov/oes/current/oes\\_nat.htm#00-0000](http://www.bls.gov/oes/current/oes_nat.htm#00-0000).

### **13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers**

There will be no new annual capital or maintenance costs to the respondent as a result of this data collection.

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

ODPHP may incur the following estimated costs annually in setting up testing environments and collecting and summarizing data:

- Developing study protocols: \$30,000
- Developing study stimulus materials: \$4,000
- Moderators and usability experts to conduct research: \$10,000
- Study participant recruitment: \$3,000
- Meeting space for data collection: \$1,000
- Study participant stipends: \$3,000
- Data summary and reports: \$48,000

Estimated Annualized Cost to Government: \$99,000

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

ODPHP is proposing the following program changes:

1. Revise purpose and justification to reflect ODPHP's current office initiatives and priorities for the next 3 years. For example, decrease and consolidate methods and update respondent numbers.
2. Add Web-based surveys as a research method to understand user characteristics, needs, and preferences
3. Revise audience segmentation by method to allow for research with ODPHP's current main audiences: consumers and health professionals
4. Simplify burden table by combining in-person and remote as method categories, removing burden for confidentiality (this is included in the total burden for each method already), and by removing specific audiences as method categories.
5. Increase estimated hourly rate of respondents due to cost of living increases

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

There are no tabulated results for this information collection.

No complex or analytical techniques will be used for the results of the collection of information. Findings from all data collection will be included in individual summary reports submitted to ODPHP. The reports will describe the testing methods, findings, conclusions, implications, and recommendations for use in development and refinement of disease prevention and health promotion messages, materials, and tools. There will be no specific quantitative analysis of data. No attempt will be made to generalize the

findings to be nationally representative.

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

Expiration date display exemption is not requested.

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

The data encompassed by the projects discussed in this supporting statement will fully comply with all guidelines of 5 CFR 1320.9. No exception is requested to certification for Paperwork Reduction Act Submission.

**B. Collection of Information Employing Statistical Methods**

Information will not be collected requiring statistical analysis employing statistical methods.



## APPENDICES

- A. OMB Burden Statement
- B. 60-Day Federal Register Notice
- C. Collection of Information Employing Statistical Methods