

Generic Clearance to Conduct Formative Research

OMB CLEARANCE PACKAGE

0584-0524

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Submitted by:

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Consumer Research for Nutrition Education and Promotion Activities

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Supporting Statement for Paperwork Reduction Act Submissions

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.**

This is a revision of a currently approved data collection. This information collection is based on Section 19 of the Child Nutrition Act of 1966 (42 U.S.C. 1787) Section 5 of the Richard B. Russell National School Lunch Act (42 U.S.C. 1754) and Section 11(f) of the Food and Nutrition Act of 2008 (7U.S.C.2020). This request for approval of information collection is necessary to obtain input into the development of nutrition education resources and interventions for population groups served by the U.S. Department of Agriculture, Food and Nutrition Service (USDA-FNS).

Diet has a significant impact on the health of citizens. Diet quality is linked to four leading causes of disease, which can reduce the quality of life and cause premature death. While diet-related problems, including obesity affect all Americans, they have a greater impact on the disadvantaged populations served by many FNS programs. One of FNS' goals includes improving the nutrition of children and low-income families by providing access to program benefits and nutrition education. The FNS programs include Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamp Program (FSP), Child Nutrition, Food Distribution, and the Supplemental Foods Program for Women, Infants and Children (WIC).

The basis of our approach rests on the philosophies that all health communications and social marketing activities must be science-based, theoretically grounded, audience-driven, and results-oriented. Secondly, consumer-based health communications require a focus on specific target audiences, encourage positive behaviors in culturally relevant ways, identify unique benefits and supports for adopting the new behavior, insights into the most appropriate time and inspire consumers to take action to the message. Interventions need to be designed so that they to allow them to be delivered through different types of media and in a variety of formats for diverse audiences.

FNS develops a variety of resources to support nutrition education and promotion activities. These resources are designed to convey science-based, behavior-focused messages about healthy eating and physical activity to children and adults eligible to participate in FNS nutrition assistance programs and to motivate them to adopt healthful eating behaviors as defined by the Dietary Guidelines for Americans (DGAs). This includes education and program materials, messages, promotion tools and interventions for the diverse population served by the federal nutrition programs including WIC, SNAP Child Nutrition, Food Distribution and other programs.

The following list includes formative research activities that have previously been authorized under the generic collection. Similar types of activities are anticipated over the period of clearance:

- Consumer Research for Nutrition Education and Promotion Activities
- Core Nutrition Messages
- School Wellness Communication Tools Testing
- Team Nutrition Curriculum
- Team Nutrition Testing for Elementary and Middle School

- Food Distribution Food Quality and Messaging surveys
- Applications or Nominations for nutrition education and wellness award programs promoting best practices

Future activities will support a variety of program projects and ongoing interventions, social marketing initiatives, outreach and awareness efforts - such as nutrition education and promotion activities, food safety education and activities necessary to meet emerging needs, update current resources, and support new program and/or national policy initiatives.

Formative research methods and information collection will include multiple approaches such as focus groups, interviews (dyad, triad, telephone) field-testing, curriculum, surveys and web-based information gathering tools. In accordance with OMB guidance regarding this generic clearance, we will provide individual memos explaining the exact methods of information collection as well as copies of the tools or instruments for gathering the data with each clearance package.

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.

The information collected by FNS or its contractors provides formative input and feedback on how best to reach and motivate the FNS target population. The data obtained provides insights regarding the content, potential use of materials and products. Insights regarding implementation approaches and delivery methods help to identify approaches that are more effective in reaching, engaging and motivating the target audiences to act considering their resource constraints. The information collected allows

the agency to make appropriate adjustment in content and the methods used in the developmental and testing stages in order to improve the final products.

Under this generic clearance, the agency will collect information from a variety of program participants and potentially eligible person, State and local program partners and service providers, and others that play a direct role and/or influence factors that mediate conditions that affect decision of the audiences FNS programs serve. In order to determine future nutrition education and outreach needs, tools and dissemination strategies, key informant interviews will be conducted. This task involves collecting a diverse array of information from a variety of groups including perspectives from people familiar with: the target audiences; the objectives of nutrition education and outreach interventions and projects; program constraints at State and local levels; and related issues. Expert opinions from program constituencies, researchers, and practitioners will be collected through focus groups, interviews, surveys and/or other methods. FNS will also collect information regarding effective nutrition education and outreach initiatives implemented by State agencies that administer nutrition assistance programs to promote repetition of promising practice-based interventions. The information collected via these methods is not nationally representative and FNS will not attempt to generalize the findings to be nationally representative or statistically valid.

Fundamental to FNS' success in delivering science-based nutrition messages and reaching diverse and low literacy segments of the population is obtaining qualitative feedback from key components of the target audience on the communication strategies and interventions that will be developed. This formative research is essential to

advancing FNS nutrition education and outreach efforts. The formative input and testing methods described in this request will assist in the development of more effective tools, communication strategies and implementation methods. Collection of this information will increase FNS' ability to formulate nutrition education and outreach interventions that resonate with and motivate the target population of low-income American families.

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.

FNS makes every effort to comply with the E-Government Act, 2002. For example, focus groups concerning Web-site development will be accomplished via computers. The agency also uses electronic methods to collect feedback from stakeholders including program participants/eligibles, State and local staff and others concerning materials that are disseminating through the Web Site and to gather information about how professional use these materials. Online feedback provides ongoing information about the resources, how educators use them, changes needed to increase usability, etc. When feasible, the agency uses web-based surveys and other online tools.

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.

Information collection under this package builds on rather than duplicates any prior research. FNS coordinates all information collection thru a central staff located in

the Office of Policy Support (OPS) and consults with programs and Center for Nutrition Policy and Promotion (CNPP) about impending data collections. As previously stated, formative input and feedback provide insights into how best to reach and motivate the FNS target populations. The attitudes, beliefs, views and perceptions of target audiences evolve and change as other social/environmental changes occur. The Agency reviews information acquired through prior collections, peer review literature and other sources. However, this information collection provides insights into current consumer's perceptions on the usability, appeal, relevance and feasibility of new materials, products, dissemination methods, information seeking preferences, etc., allowing the agency to make adjustments to improve potential effectiveness of these products.

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

The information collection will not have an impact on small businesses or other small entities.

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.

Failure to collect information would decrease the efficacy of resources, tools and interventions. Without this information, FNS will lose valuable input from the culturally and ethnically diverse populations served by the nutrition assistance programs. Research has consistently shown that formative input and consumer testing during development is critical and improves the acceptance and effectiveness of educational materials and processes used to deliver these services. This information collection will assist in the development and communication of messages based on the current *Dietary Guidelines*

for Americans to the FNS target audience in ways that are relevant and that inspire them to make appropriate changes in behaviors. The target groups for the nutrition assistance programs consists primarily of low-income populations that are at greater risk for developing diet-related health problems such as obesity.

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; 12 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. Reporting will occur when necessary in order to carry out multiple information collections for various projects. No

recurring requirements will be necessary as each information collection will be a one-time collection.

- 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.

Notice of this data collection was published in the Federal Register at 81 FR 8474 on February 19, 2016. No relevant comments were received. The 60-day notice published in the Federal Register allows the public and stakeholders an opportunity to comment on this collection. In addition, the agency solicits input from stakeholders through feedback mechanism such as those previously approved by OMB, annual plans and reports and personal contacts at meetings and other venues.

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

Focus group and selected interview participants may receive a cash stipend. 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 research project.

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

FNS and contractors will follow procedures for assuring and maintaining privacy consistent with the Privacy Act during all stages of data collection. Focus group participants will receive information about privacy in an advance letter and/or before the focus groups begin. Participants in the semi-structured intercept interviews and telephone interviews will receive information about privacy before beginning the interviews. When appropriate, respondents will be informed that all information will be kept private by the information collection team and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law.

Release forms for focus groups and interviews will cite the Privacy Act.

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.

Information collection will not involve questions of a sensitive nature.

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

- **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.**

Estimates are based on both the historical numbers of respondents from past projects as well as projections of projects to be conducted over the next three years.

Research Method	Number of Respondents	Frequency per Respondent	Total Responses	Time per Response (Hours)	Total Burden in Hours
Focus Group Screeners	11,250	1	11,250	0.25	2,813
Interview Screeners/Surveys	22,500	1	22,500	0.25	5,625
Focus Groups	6,750	1	6,750	2	13,500
Intercept Interviews	2,000	1	2,000	0.5	1,000
Dyad/Triad Interviews	3,000	1	3,000	1	3,000
Telephone Interviews	13,500	1	13,500	0.5	6,750
Surveys	7,000	1	7,000	0.5	3,500
Web-based Collections	4,500	1	4,500	0.5	2,250
Confidentiality Agreements	30,000	1	30,000	0.167	5,010
Forms (web-based consumer feedback, response, pre-post test forms, etc)	20,000	1	20,000	0.167	3,333
3- Year Total Requested:	120,500	1	120,500	0.39	46,781

Continued clearance is requested for the following activities and instruments that are currently cleared in this collection.

Instrument/Activity	Form Number	Affected Public	Estimated No. of Annual Respondents	Frequency per Respondent	Total Annual Responses	Estimated Time (Hours) per response	Total Burden Hours
Team Nutrition School Enrollment Form	FNS-781	State, Local, Tribal Gov't	6000	1	6000	0.083	500.00
Power Panther Costume Request and Agreement Form	FNS-807	State, Local, Tribal Gov't	105	1	105	0.250	26.25
Power Panther Costume Event Feedback Form	FNS-808	State, Local, Tribal Gov't	105	1	105	0.167	17.50
Level 1 Event Feedback Form	FNS-816	State, Local, Tribal Gov't	1500	1	1500	0.083	125
Level 3 Event Feedback Form	FNS-817	State, Local, Tribal Gov't	1500	1	1500	0.167	250
Attendee Evaluation Form	FNS-854	State, Local, Tribal Gov't	3000	1	3000	0.083	250
Healthier US School*	FNS-779	State, Local, Tribal Gov't	1000	1	1000	2.000	2,000

Subtotal for Consumer Research for Nutrition Education and Promotion Activities - SLT IC				13210	1	13210	0.240
Level 1 Event Feedback Form	FNS-816	Business	300	1	300	0.083	25
Level 3 Event Feedback Form	FNS-817	Business	300	1	300	0.167	50
Attendee Evaluation Form	FNS-854	Business	600	1	600	0.083	50
Subtotal for Consumer Research for Nutrition Education and Promotion Activities - Business IC				1200	1	1200	0.104
Team Nutrition Educational Technology Environmental Scan*		State, Local, Tribal Gov't	2980	1	2980	0.168	501
Grand Total (3 years)			17390	1	17390	0.218	3794.75

* 1 year burden because the collections are ending this year (2016) in 0584-0524

Summary	Number of Respondents	Frequency/ Number of Responses	Total Annual Responses	Time per Response (Hours)	Total Annual Burden in Hours
3- Year Total Requested:	120,500	1	120,500	0.39	46,781
Total Used for ICs submitted with this renewal:	17,390	1	17,390	0.22	3,795
Total Remaining:	103,110	1	103,110	0.42	42,986

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

Testing Instrument or Method	Total Burden Hours	Hourly Rate (\$)	Total Cost
Focus Group Screeners	2,813	\$ 14.38	\$ 40,443.75
Interview Screeners/Surveys	5,625	\$ 14.38	\$ 80,887.50
Focus Groups	11,475	\$ 14.38	\$ 165,010.50
	2,025	\$ 25.48	\$ 51,597.00
Intercept Interviews	1,000	\$ 14.38	\$ 14,380.00
Dyad/Triad Interviews	3,000	\$ 14.38	\$ 43,140.00
Telephone Interviews	6,750	\$ 25.48	\$ 171,990.00
Surveys	3,500	\$ 14.38	\$ 50,330.00
Web-based Collections	2,250	\$ 25.48	\$ 57,330.00

Confidentiality Agreements	4,259	\$ 14.38	\$ 61,237.23
	752	\$ 25.48	\$ 19,148.22
Forms (web-based consumer feedback, response, pre-post test forms, etc)	3,333	\$ 14.38	\$ 47,933.33
Total	46,781		\$ 803,427.53

- \$14.38 mean hourly wages file clerks [Source: U.S. Department of Labor, Bureau of Labor Statistics: Occupational Employment and Wages, May 2015 <http://www.bls.gov/oes/current/oes434071.htm>]
- \$25.48 mean hourly wage for educators/teachers [Source: U.S. Department of Labor, Bureau of Labor Statistics: Occupational Employment and Wages, May 2015 http://www.bls.gov/oes/current/oes_nat.htm#25-0000]

13. Provide estimates 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.

For the respondents there are no capital or operating and maintenance costs associated with this collection. The only cost to respondents will be value of the time spent responding as explained in chart above.

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 Agency incurs costs in setting up testing environments to include such things as hiring contractors, facilitators or moderators, renting meeting space, in providing cash stipends, etc. Costs will be determined on an individual project basis and will be included in the memo provided to OMB for each formative research project. Based on historical data and expenditures over the last three years we project annualized cost to be about \$400,000.

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

The estimated burden for this generic has been reduced by approximately 20% based upon historical usage of the generic information collection and future projections. The 3-year total burden hours requested have been reduced from 58,405 to 46,781 and responses reduced from 151,700 to 120,500 due to this estimate adjustment. After reducing burden for continuing collections submitted with this revision, the requested hours are 42,986 and responses are 103,110. The Agency believes that the number of hours and respondents requested will be sufficient to meet the needs of data collection events over the next three years.

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

Contractors will provide summarized findings of all research in reports to USDA-FNS. These reports will describe the research methods used, findings, conclusions, implications, and recommendations to enhance development of nutrition education and outreach materials for low-income population groups. In the reports, the Contractors will address recommendations to enhance resources and effective dissemination strategies. The reports will also describe some of the factors that may influence the target audience in making behavior changes.

FNS will not use complex analytical techniques for data resulting from collection of information under the generic package. There will be no extensive quantitative analysis of data. No attempt will be made to generalize the findings as nationally representative or statistically valid.

After completion of data collection and clearance of reports, the findings may be reported in appropriate journals, professional meetings and conferences, training for FNS and program staff, etc. in order to disseminate the information and promote appropriate use to those who interact with a similar target audience.

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.

FNS is not seeking exemption from this requirement.

18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

No exceptions to the certification statement are requested.