

**Supporting Statement for a Request for OMB Review under
The Paperwork Reduction Act**

PART A

1 IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

Title: Safer Choice Logo Redesign Consultations

EPA ICR No.: 2487.02 OMB Control No.: 2070-0189

EPA Docket ID No.: EPA-HQ-2016-0111

1(b) Short Characterization / Abstract

This renewal information collection request (ICR) addresses the consultation process that would assist the EPA with the refinement and enhancement of the logo redesign and education approach for the Safer Choice Product Recognition Program (Safer Choice program), formerly known as the Design for the Environment Program. The Safer Choice program recognizes products where all ingredients meet EPA's stringent requirements for human health and the environment as found in the Safer Choice Standard. Under the encouragement of the current program, leading companies have already made great progress in developing safer, highly effective chemical products. Since the program's inception in 1997, formulators have been using the program as a portal to OPPT's unique chemical expertise, information resources, and guidance on greener chemistry. Safer Choice partners enjoy Agency recognition, including the use of the Safer Choice label on qualifying products.

The Safer Choice program adopted a new logo in March 2015 in response to stakeholder feedback. Following the launch of the new logo, consumer surveys have and will be used to gauge consumer recognition of the new logo and understand how the new logo and educational activities are diffusing over time and changing purchasing decisions. This ICR would enable Safer Choice to continue collecting feedback from consumers through focus groups and online surveys and integrate it into the program, which would help to strengthen the visibility of the logo and program, improve product recognition among formulators and partners, and further promote chemical safety.

12. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

Authority for the Safer Choice program derives from Section 6604(b)(5) of the Pollution Prevention Act (PPA), 42 U.S.C. 13103(b)(5) (see Attachment A), which directs EPA to

facilitate the adoption of source-reduction techniques by businesses, and the Toxic Substances Control Act (15 U.S.C. 2601 et seq.), which encourages safety in technological innovation in chemistry. In recognition of this statutory directive, and through consultation with a broad range of stakeholders, EPA developed the Safer Choice program.

Testing of the Safer Choice logo and educational activities via consumer focus groups and consumer online surveys will help ensure that the logo effectively communicates the Agency's missions under the PPA and TSCA. A logo that is clear and signals a focus on human health and the environment will increase demand for and encourage the development of safer chemical-based products, to the benefit of consumers, manufacturing partners, retailers, other stakeholders, and the environment. Effective outreach can help determine if the logo is permeating the marketplace and identify strategies for further enhancing its visibility to consumers.

Safer Choice has carefully tailored its request for information to ensure that it only asks for information essential to testing the qualities of the selected redesigned logo concepts and outreach efforts.

1 2(b) Practical Utility/Users of the Data

The information collected by the Safer Choice program is not designed or intended to support regulatory decision-making by EPA. EPA uses the information collected in these consultations to design or verify that the redesigned logo: (1) conveys the program's scientific expertise and the human health and environmental benefits of using safer products, as shown in consumer focus groups and survey testing; (2) increases consumer recognition of safer products carrying the redesigned Safer Choice logo; and (3) encourages businesses to participate in the Safer Choice program, given a positive response to the new logo among consumers.

13. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Non-Duplication

Respondents will not be asked to provide information that has been or is currently being collected by EPA, other federal or state agencies, or proprietary sources. The information collected by the Safer Choice program is unique and is not duplicative of previous information collection requests.

1 3(b) Public Notice Required Prior to ICR Submission to OMB

In proposing to renew this ICR, EPA provided a 60-day public notice and comment period that ended on January 3, 2017 (81 FR 76584, November 3, 2016). EPA received no comments during the comment period.

1 3(c) Consultations

Under 5 CFR 1320.8(d)(1), OMB requires agencies to consult with potential ICR respondents and data users about specific aspects of ICRs before submitting an original or renewal ICR to OMB for review and approval. However, there are no established, organized entities with whom EPA has a relationship for purposes of this ICR. Since EPA was not able readily to identify potential respondents or data users, the Agency has not conducted such consultations.

1 3(d) Effects of Less Frequent Collection

Up to three consumer focus groups will be convened to test the redesigned Safer Choice logo for familiarity and usefulness. Additional details about recruitment for and implementation of the focus groups are provided in Attachments B, C, and D. Each consumer focus group consultation is designed to be a one-time information collection activity with consumers specifically recruited for the Safer Choice logo redesign. The three post-launch consumer online surveys will be conducted to gauge recognition of the new logo. Each post-launch consumer online survey will be a one-time information collection activity. This means that once these activities end, no additional information collection activities will be required. Without these information collection mechanisms, Safer Choice will not have the ability to test and verify consumer perceptions and understanding of the new design and whether products displaying the new logo are affecting the likelihood of acceptance, use, and recognition.

1 3(e) General Guidelines

The information collection activities discussed in this renewal ICR comply with all regulatory guidelines under 5 CFR 1320.5(d)(2). The collection is tailored to the Agency's purposes under the Pollution Prevention Act to maximize the integrity and utility of the information while imposing the least burden on potential respondents. In addition, EPA has detailed the statistical methods that will be applied to the collection activities in Supporting Statement Part B.

1 3(f) Confidentiality

EPA does not expect that any information collected under this ICR will involve confidential business or trade secret information given that the data collection instruments are oriented towards consumers. The information collected will only pertain to the opinions of the respondents on the specific characteristics of the redesigned logo concepts as to their clarity, relevance, appeal, and likelihood of using products which are displaying the new design and the effectiveness and usefulness of educational and outreach activities. The Safer Choice program will use the information provided by consumers solely for purposes related to determining how to more effectively educate consumers and other stakeholders on the redesigned logo. In the report of the research, all information will be aggregated, with no identification of individuals. Participants will be informed in advance that there will be an aggregated report of conclusions available to the public following the completion of the research. Participants will be reassured that no individually identifiable information will be included in the report.

1 3(g) Sensitive Questions

The information collection activities discussed in this document do not involve any sensitive questions involving sexuality, religious beliefs, political affiliation, or other matters considered private, as referred to in the Supporting Statement for PRA Submissions in the document “Guidance on Agency Survey and Statistical Information Collections,” from January 20, 2006. EPA will adhere to its Privacy Policy (EPA classification number 2151) that establishes requirements for safeguarding the collection, access, use, dissemination, and storage of personally identifiable information (PII) and Privacy Act information in accordance with the Privacy Act of 1974, the E-Government Act of 2002, the Federal Information Security Management Act (FISMA), and policy and guidance issues by the President and Office of Management and Budget (OMB).

14. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents

Respondents will be adult members of the general population who are consumers, including consumers who consider the environment when making purchasing decisions (i.e., “leaning green” consumers).

4(b) Information Requested

Respondents screened for focus group participation will listen to questions and provide answers to those questions. Respondents selected to participate in the focus groups will listen to directions, be presented with materials for discussion, participate in group discussions, and complete forms. Consumer online survey participants will read directions, answer questions, and submit the online survey.

15. THE INFORMATION COLLECTED – AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

EPA and its contractor will engage in the following activities related to the logo redesign survey and focus group process:

- Prepare and review focus group materials;
- Prepare and review screener questionnaires;
- Conduct focus group screening calls;
- Conduct focus groups;
- Review and analyze focus group results;
- Prepare and review consumer online surveys;
- Conduct consumer online surveys;
- Review and analyze consumer online surveys; and
- Use focus group and consumer online survey information to evaluate consumer recognition of the redesigned logo and effectiveness of outreach efforts.

1 5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA and its contractor will use a telephone system and personal computers. The contractor will employ transcription to collect information from focus group participants. The transcriptions will be kept on file but will not be distributed publicly. Personal computers will be used for the consumer online surveys. Detailed information on survey resources is included in Supporting Statement Part B.

1 5(c) Small Entity Flexibility

The intended respondents to the information collection activities addressed in this ICR are individual consumers and not small entities, as defined under the Regulatory Flexibility Act. No information will be collected from small entities during this information collection.

1 5(d) Collection Schedule

Screening calls, focus groups, and the online surveys will be scheduled after this ICR is approved. Up to three consumer online surveys to gauge recognition of the new logo will be distributed during the course of the three-year approval period.

A proposed timetable is outlined as follows:

Activity	Time Frame
Conduct focus group sessions	TBD
Field survey and conduct focus group to test consumer recognition and perception of new design and effectiveness of outreach efforts	Early 2020
Field survey and conduct focus group to test consumer recognition and perception of new design and effectiveness of outreach efforts	Early 2021
Field survey and conduct focus group to test consumer recognition and perception of new design and effectiveness of outreach efforts	Early 2022

16. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

The average respondent burden is estimated to be 10 minutes or 0.17 hours for respondents screened for the focus groups. This estimate is based on the length of time needed to complete a screening questionnaire. There will be two sets of screening questions used for this information collection, one for general adult consumers and one for adult consumers that lean towards the purchase and use of green products. For each focus group, 90 people will be screened using the respective questionnaire. A total of 900 people will be screened as part of this information collection. There is an estimated total respondent burden of 150 hours for the ten focus group screenings.

The average respondent burden is estimated to be 2 hours for focus group participants. This estimate is based on the length of time designated for each focus group session. There will be ten focus groups conducted during this information collection, five for general adult consumers and five for adult consumers that lean towards the purchase and use of green products. Each focus group will have between 8 to 10 participants and we expect a no-show rate of no more than 2 participants per focus group. For the purpose of calculating burden, we assume that each focus group will have 9 participants. A total of 90 people will participate in the focus groups conducted as part of this information collection. For the ten focus groups, there is an estimated total respondent burden of 180 hours.

The average respondent burden is estimated to be 20 minutes or 0.33 hours for the consumer online survey to gauge consumer recognition of the redesigned logo and outreach efforts. This estimate is based on the length of time needed to complete the survey. There will be three iterations of the consumer online survey conducted during this information collection, each of which will use the same set of questions. The same survey will be administered to all respondents. Each consumer online survey will have 2,000 respondents. A total of 6,000 people will complete the consumer online survey as part of this information collection, resulting in an estimated total respondent burden of 2,000 hours.

6(b) Estimating Respondent Costs

To value the respondents' time, EPA estimates an average loaded hourly labor rate (base hourly rate plus fringe and overhead) of \$38 for a civilian worker, which includes private industry and state and local government workers, based upon wage data from the Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation* from December 2015. The hourly labor rates include a 17% overhead; this overhead rate is used for consistency with OPPT economic analyses for two major rulemakings: *Wage Rates for Economic Analyses of the Toxics Release Inventory Program*¹ and the *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*.² In addition, the hourly labor rates have been rounded for the purposes of this ICR. The derivation of the labor rate for a civilian worker is shown in Exhibit 6.1.

1Exhibit 6.1. Derivation of Loaded Wage Rates in 2015\$

Labor category	Wage	Fringe Benefit	Fringes as % wage	Overhead % wage	Fringe + overhead factor	Loaded Wages	Loaded Wages (rounded)
	(a)	(b)	(c)=(b)/(a)	(d)	(e)=(c)+(d)+1	(f)=(a) × (e)	
Civilian ³	\$23.06	\$10.52	45.62%	17%	1.63	\$37.50	\$38.00

Providing monetary incentives is a standard market research practice (usually a cash or check payment at the close of their research session) for ensuring an acceptable level of participation. An incentive may significantly improve validity and reliability to the extent beyond what is possible through other means. For example, an incentive will help in the recruitment of participants with diverse views and levels of interest in the topic area. EPA is particularly interested in a balanced group of consumers and believes that providing an incentive will improve the quality of the effort. The total incentive/travel reimbursement offered to each focus group participant will be \$75 for 2 hours, which includes time for participating in the focus group and travel to and from the focus group. It is important to note that most of the research on incentives has been based on vehicles other than focus groups, typically large-scale household surveys conducted by mail, internet, or interview. Focus groups involve a higher respondent burden, largely attributable to the time, expense, and inconvenience of getting to and from and being at the focus group site. Given the very real barriers to participation, the incentive must be sufficient to overcome them and increased compensation is a proven means to that end.

Survey participants receive an incentive for participating in the panel. They receive points for completion of the survey, and the points can be redeemed for cash or prizes. Offering points for taking online surveys is standard practice that Ipsos, the survey vendor for this research, follows. Ipsos stipulates this practice in its agreement with participants.

¹ EPA, 2002b. U.S. EPA, Office of Pollution Prevention and Toxics, Economic and Policy Analysis Branch, *Wage Rates for Economic Analysis of the Toxics Release Inventory Program*. Washington, DC: June 10, 2002.

² EPA, 2002. U.S. EPA, Office of Pollution Prevention and Toxics, Economic and Policy Analysis Branch. *Revised Economic Analysis for the Amended Inventory Update Rule: Final Report*. Washington, DC. August 2002.

³ Bureau of Labor Statistics (BLS) *Employer Costs for Employee Compensation*. Employer costs per hour worked for employee compensation and costs as a percent of total compensation: Civilian workers, by major occupational and industry group, December 2015. Available at: http://www.bls.gov/news.release/archives/ecec_03102016.pdf.

In Exhibit 6.2 we show the breakdown of burden costs, assuming 0.17 hours for completing the consumer focus group screening, 2 hours for participating in consumer focus group interviews, and 0.33 hours for completing the consumer online survey. Note that the 2 hours for participating in consumer focus group interviews includes 1.5 hours for the focus group sessions and 0.5 hours for travel. A total of 900 respondents are expected to complete the screening for consumer focus groups, along with 90 respondents who will then be selected to participate in the consumer focus group interviews. An additional 6,000 respondents are expected to complete the consumer online survey. No capital or operating and maintenance costs are incurred by respondents under this ICR.

1Exhibit 6.2. Estimated Burden and Costs to Respondents (Over Three Years)

Collection Activity	Number of Respondents	Frequency of Response	Hours Per Response	Total Burden Hours	Total Cost
Screening for Consumer Focus Groups	900	1	0.17	150	\$5,700
Consumer Focus Group Interviews	90	1	2	180	\$6,840
Consumer Online Survey	6,000	1	0.33	2000	\$76,000
Total	6,990	--	--	2,330	\$88,540

6(c) Estimating Agency Burden

1Exhibit 6.3 presents the estimated Agency burden hours and costs associated with the information collection activities under this ICR. EPA based its burden estimates on the costs of conducting focus groups and online surveys that occurred under the previous ICR (OMB no. 2070-0819).

The cost to prepare, organize, and conduct the ten focus groups is \$35,750. This fixed amount includes facility rental, recruiting costs, and transcription. This fixed amount also includes the \$75 incentive paid to each of the focus group participants. Although the contractor will make the focus group screening calls, prepare the focus group materials, and conduct the focus groups, Agency staff will need to review the focus group materials, the screening questionnaires, and the focus group results. EPA expects that review of the focus group materials will take about 2.5 hours (0.5 managerial, 2 technical). Reviewing the focus group screening questionnaires will take about 2.5 hours (0.5 managerial, 2 technical). Reviewing the focus group results will take about 25 hours (5 managerial, 20 technical).

The cost to prepare and conduct the three consumer online surveys is \$23,625. This fixed amount includes questionnaire development, programming, online fielding, results reporting, and the rewards points that consumers receive upon completing the survey. Although the contractor will prepare and conduct the consumer online surveys, Agency staff will need to review the survey content, design, and results. EPA expects that review of the survey content and design will take about 5 hours (1 managerial, 4 technical). Reviewing survey results will take about 10 hours (2 managerial, 8 technical).

6(d) Estimating Agency Costs

Agency labor costs are calculated based on hourly basic rates for federal employees in the Washington-Baltimore area published by the Office of Personnel Management effective January 2016⁴. The average hourly labor rate for managerial staff is estimated as the rate for a GS-13 Step 5 employee, for technical staff as a GS-10 Step 10 employee, and for clerical staff as GS-5 Step 1. These GS-level assumptions are consistent with those used in past EPA OPPT ICRs. The hourly rates were multiplied by an assumed loading factor of 1.6 to reflect Federal fringe benefits and overhead. This loading factor is from an EPA guide, *Instructions for Preparing Information Collection Requests (ICRs)* (OPPE, 1992, page 30, footnote 9).

The resulting average hourly labor rates, rounded to the nearest dollar amount, are \$80 for managerial staff, \$59 for technical staff, and \$27 for clerical staff. The Agency expects most activities related to this ICR to be performed by managerial staff (20 percent) and technical staff (80 percent).

Exhibit 6.3. Estimated Agency Burden/Cost (Over Three Years)

Collection Activity	EPA Burden Hours			EPA Costs	
	Mgr. \$80/Hr	Technical \$59/Hr	Total EPA Hours	Contractor Cost*	EPA Cost
Consumer Focus Groups					
Prepare focus group materials	0.5	2	2.5	\$35,750 for ten focus groups	\$158.00
Prepare screener questionnaires	0.5	2	2.5		\$158.00
Organize and conduct focus groups	0	0	0		\$0.00
Review focus group results	5	20	25		\$1,580.00
<i>Subtotal</i>	6	24	30	\$35,750	\$1,896.00
Consumer Online Surveys					
Prepare consumer online surveys	1	4	5	\$23,625 for three consumer online surveys	\$316.00
Review consumer online survey results	2	8	10		\$632.00
<i>Subtotal</i>	3	12	15	\$23,625	\$948.00
Total	9	36	45	\$59,375	\$2,844.00

*Contractor cost includes facility rental, recruiting, incentives and rewards points, and transcription

⁴ OPM, 2016. Salary Table 2016-DCB, *Washington Baltimore Northern Virginia, DC-MD-PA-VA-WV*. Available at http://www.opm.gov/oca/16tables/pdf/dcb_h.pdf.

1 6(e) Bottom Line Burden Hours and Cost Tables

a. Respondent Tally

Exhibit 6.4 below summarizes the total annual estimated respondent burden and cost. These estimates represent the average burden in any given year over the three years covered by this ICR. However, the ten focus groups, and their respective screening calls, and the consumer online surveys will only be conducted once over the three-year period.

Exhibit 6.4. Total Annual Estimated Respondent Burden and Cost Summary

Total # of Respondents	Total Burden Hours	Annual Cost
6,990	2,330	\$29,513

b. Agency Tally

Exhibit 6.5 below summarizes the total annual estimated Agency burden and cost (including contractor cost). These estimates represent the average burden in any given year over the three years covered by this ICR. However, the ten focus groups, their respective screening calls, and the consumer online surveys will only be conducted once over the three-year period.

Exhibit 6.5. Total Annual Estimated Agency Burden and Cost Summary

Burden Hours	Annual Cost
15	\$20,740

6(f) Reasons for Change in Burden

There is an increase of 333 hours in the estimate of respondent burden hours compared with that identified in the information collection most recently approved by OMB (from 1,997 hours to 2,330 hours). This increase reflects an increase in per-response burden estimates for completing the consumer online survey based on experience from the previous ICR. However, there was an overall decrease in the number of responses because EPA will conduct fewer consumer online surveys (three versus four surveys over the course of three years). The overall result was an increase in the burden hours and a decrease in the number of respondents.

6(g) Burden Statement

The annual public burden for this collection of information, which is approved under OMB Control No. 2070-0189, is estimated to range between 0.17 hours and 2.0 hours per response depending upon the nature of the respondent. Burden is defined in 5 CFR 1320.3(b). An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a current and valid OMB control number. The OMB control numbers for EPA's regulations in title 40 of the CFR, after appearing in the Federal Register, are listed in 40 CFR part 9 and included on the related collection instrument or form, if applicable.

The Agency has established a public docket for this ICR under Docket ID No. EPA–HQ–OPPT–2016–0111, which is available for online viewing at <http://www.regulations.gov>, or in person viewing at the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Pollution Prevention and Toxics Docket is (202) 566-0280. You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques.

You may submit comments regarding the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques. Submit your comments, referencing Docket ID No. EPA–HQ–OPPT–2016–0111 and OMB Control No. 2070-0189, to both EPA and OMB as follows:

- To EPA online using <http://www.regulations.gov> (our preferred method), or by mail to: Pollution Prevention and Toxics Docket, Environmental Protection Agency Docket Center (EPA/DC), Mailcode: 28221T, 1200 Pennsylvania Ave., NW., Washington, DC 20460, and

- To OMB by e-mail to: oir_submission@omb.eop.gov. Address comments to OMB Desk Officer for EPA.

ATTACHMENTS TO THE SUPPORTING STATEMENT

Attachments to the supporting statement are available in the public docket established for this ICR under docket identification number EPA–HQ–OPPT–2016–0111. These attachments are available for online viewing at <http://www.regulations.gov> or otherwise accessed as described in section 6(g) of the Supporting Statement.

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- Attachment A: 42 USC 13103 - Pollution Prevention Act Section 6604.**
- Attachment B: Screening Questionnaire for General Adult Consumer Focus Group**
- Attachment C: Screening Questionnaire for “Leaning Green” Consumer Focus Group**
- Attachment D: Moderator’s Guide for Consumer Focus Group**
- Attachment E: Survey to Test Awareness and Perceptions of EPA’s Safer Choice Label: General Adult Population Survey**