

**Supporting Statement for:
CPSC Playground Surfaces Survey
(CPSC)**

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A. JUSTIFICATION

A.1. Circumstances that Make the Collection of Information Necessary

The use of recycled tire material or “tire crumb” is commonplace for many athletic fields as well as children’s playgrounds. Playground surfaces derived from recycled tires are a popular option due to their low maintenance, variety of colors and designs, and ability to reduce the impacts from falls. Concerns have been expressed by a wide variety of stakeholders about the safety of playground surfaces derived from recycled tires. Although there have been investigations¹ into the safety of using these materials that have not found adverse effects to date, there is no comprehensive study to understand the full effects of the use of these materials.

In February, 2016, as part of their mission to protect the American public from hazardous consumer materials, the Consumer Product Safety Commission (CPSC), Environmental Protection Agency (EPA), and the Centers for Disease Control and Prevention (CDC) launched the interagency Federal Research Action Plan on Recycled Tire Crumb Used on Playing Fields and Playgrounds (“Plan”). The Plan’s objective is to identify the potential hazardous chemical exposure to children derived from recycled tire material used regularly on playgrounds throughout the United States. While parties including the EPA and CDC are working to shed light on the chemical hazards from recycled tire materials on athletic playing fields, CPSC is tasked with research to establish the level of risk and the extent to which children may be exposed to potential hazard(s) related to recycled rubber on playgrounds.

CPSC planned a two-part investigation. First, the CPSC conducted focus groups² to gather data from a small sample of parents, childcare providers, and personnel responsible for the inspection and maintenance of playgrounds on their experiences and observations of how children interact with various types of playground surfaces, including those derived from recycled tires. This part is complete and not the focus of this proposal.

The second part of CPSC’s two-part investigation is the current proposal. The proposed study consists of a survey of a geographically and demographically diverse sample of parents to better understand potential exposures based on children’s play behaviors on playgrounds. The proposed survey was developed using findings from the focus groups in the first part of CPSC’s investigation. The survey data will help the CPSC to estimate exposure and risk, and make recommendations regarding playground surfaces derived from recycled tires.

A.2. Use of Information

The results from CPSC’s investigation will be used in conjunction with the findings from the other agencies involved in the Plan to provide recommendations regarding playground surfaces derived from recycled tires based on the risk associated with exposure.

¹ Vidair, C., Haas, R., & Schlag, R. (2007). Contractor’s Report to the Integrated Waste Management Board, “Evaluation of Health Effects of Recycled Waste Tires in Playground and Track Products.”

<http://www.calrecycle.ca.gov/publications/Documents/Tires%5C62206013.pdf>

² OMB Control Number 3041-0136.

Since the actual distribution of playgrounds using recycled tire material is difficult to measure, the proposed survey will collect data from a sample of parents of children ages 0-5 years who may visit playgrounds. The survey will assess frequency of visits and child behavior on playgrounds, including relevant situational factors (e.g., parent supervision, playground equipment, playground maintenance).

The survey was drafted by CPSC staff and Fors Marsh Group, LLC (FMG). The final survey will be programmed and administered over the phone by SSRS, LLC. Following data collection, FMG will summarize the results and provide a final report along with the dataset to CPSC staff.

By understanding how children interact with the playground equipment and especially the surface material, CPSC staff can provide estimates of exposure to playground surfacing. This may include aspects such as prolonged skin contact, ingestion, and contact of the material with wounds. Combined with data regarding potential chemical hazards in recycled tires, this data will be used to analyze the level of risk to children from crumb rubber, and based on the level of risk, subsequently develop recommendations that minimize risk to children who visit such playgrounds. Findings that arise from this study can also be used by CPSC staff in designing future studies.

A.3 Use of Information Technology and Burden Reduction

The survey will be administered using a computer-assisted telephone interview (CATI) system in a secure location accessible only to authorized personnel. Participants will be recruited by re-contacting respondents of the SSRS Omnibus which is a national, weekly, dual-frame bilingual RDD telephone survey designed to meet standards of quality associated with custom research studies. Each weekly wave of the SSRS Omnibus consists of 1,000 interviews; 600 are obtained with respondents on their cell phones and approximately 35 interviews are completed in Spanish. The topic of the surveys vary week to week and follow-up re-contacts, as proposed for this study, are used to target specific populations on certain issues. We will use existing data from this sample source to pre-screen individuals in the target population (parents of children who are currently 0-5 years old). These targeted households will be re-contacted to administer the proposed survey.

The operators dialing and conducting the survey are trained interviewers. Participants will be re-screened at the beginning of the call to make sure that they meet the target criteria and to identify which subset of questions they will be given for the survey. Eligible respondents will participate with informed consent and all responses will be kept private to the extent permitted by law.

All participants will receive the screening questions, which will determine which set of questions is posed: 1) parents who take their children to the playground, 2) parents whose children visit the playground with another caretaker, and 3) parents whose children do not visit playgrounds. The questions in each category are similar, but modified slightly to make sure that the questions are appropriate. The CATI system has a question skipping pattern to minimize the respondent burden. In addition, all participants will be asked demographics questions.

To minimize respondent burden, the CATI system will make sure interviewers only ask each respondent survey items appropriate for the respondent's level of awareness and behavior relevant to playground use and recreation. The system's automatic survey control also produces status reports for ongoing monitoring of the survey's progress. The CATI scheduler will be used to route telephone numbers to interviewers, maintain a schedule of callback appointments, and reschedule unsuccessful contact attempts to an appropriate date and time.

A.4. Efforts to Identify Duplication

CPSC staff continuously seeks information from commercial market research and public health studies to support CPSC compliance, information and education, and voluntary standards activities. The present survey does not duplicate this information. To our knowledge, there has never been a comprehensive study to gather exposure data necessary to understand the full effects of the use of recycled rubber on children's health.

A.5 Impact on Small Businesses and Other Small Entities

The current study will not affect small businesses, because they are not involved in the survey.

A.6. Consequences of Not Conducting Data Collection

This is one of the few efforts to obtain data regarding children's exposure to playground surfaces, especially in relation to recycled tires. Findings will be used to develop public awareness messages, guidelines, recommendations, voluntary standards, rules and/or regulations around materials used in playground surfaces. CPSC will not have behavioral evidence to guide actions to mitigate the risks from potentially hazardous materials without the survey information.

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

There are no special circumstances that require collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

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

Any public comments received will be addressed prior to final OMB submission

A. 9 Explanation of Any Payment or Gift to Respondents

All respondents will be sent \$5 in appreciation for their time and opinions, mailed to respondents after they have participated in the survey in accordance with the standard procedure used by SSRS for the Omnibus Survey.

A. 10 Assurance of Confidentiality Provided to Respondents

Participation in this survey is voluntary. Participants will provide informed consent prior to beginning the interview. Participants will be informed that their identities will be kept confidential. No personally identifiable information will be used in the final report and resulting data delivered to the CPSC. The Contractors will destroy confidential identifiers at the end of the study.

Some interviews may be recorded as part of the quality control efforts of the study. Personally identifiable information (PII) will be excluded and these recordings will not be publicly released. Demographic information collected will be generalized in all reports. No response will be attributed to a specific individual in the final report. Any recording of interviews will be disclosed to the respondent.

Procedures for assuring and maintaining confidentiality consist of limiting access to the physical call center location and the CATI network to authorized individuals. Access restrictions are defined for each individual based on his/her role. Access to data requires the entry of a valid account username and password.

No PII transfers are anticipated. However if any data transfers containing PII are needed between the contractor and CPSC staff coordinating the connection between recruitment and the full-scale survey it will be done using password protected files. After data collection is complete, phone numbers will not remain linked to the data and will not be provided to the CPSC. The contractor will remove all PII from the dataset and assign each survey respondent with a unique ID number before the dataset is delivered to CPSC staff. Analysis will be conducted on data sets that include only respondent ID numbers; they will not contain any personal identifiers. All data will be securely stored on password-protected computers, accessible only to project staff. Respondents' phone numbers will not be stored with their data.

A.11 Justification for Sensitive Questions

The survey does not include any questions considered particularly sensitive in nature (e.g., drug use, sexual behavior). Some questions may be potentially sensitive, including those on the respondent's ethnicity, ages of their children and annual household income. These topics are essential to the objectives of the study, specifically for calculating weights. Study procedures will be designed to make respondents feel as comfortable as possible in answering these questions. Interviewers will assure respondents that participation is voluntary, that they may choose not to answer some questions, and that responses are confidential.

Participants will be informed that their names and contact information will not be linked with their responses. Participants will be assigned unique identifiers that do not include any personal identifiers. The identification numbers will be linked to contact information in one database and survey responses in a separate database. The data collection team will generate a report on refusals, ineligible households, non-working numbers, business numbers, and all other data needed to generate American Association for Public Opinion Research (AAPOR) response rates and assess potential sample bias.

A.12 Estimates of Hour Burden Including Annualized Hourly Costs

Table A-1 estimates the time burden and costs to respondents. Prior to implementation, we will assess usability with a sample of no more than 9 respondents, as described in Section B.4. The telephone interview for the proposed survey will take approximately 20 minutes (0.333 hours) to complete.

Table A-1. Estimate of respondent burden for Playground Survey

Project Activity	Number of Respondents	Frequency of Response	Time Burden of Response (hours)	Total Hours	Respondent Cost
	(A)	(B)	(C)	(D=AxC)	(Dx\$35.28)
Playground Survey	2200	1	.333	733	\$25,872

Monetized hourly cost is defined by the average total hourly cost to employers for employee compensation for employees across all occupations as of June 2017, reported by the Bureau of Labor Statistics. Total cost burden is approximately 733 hours x \$35.28, or \$25,872.

A draft of the survey follows the supporting statement.

There are no other costs to respondents and no respondent recordkeeping requirements associated with the survey.

A.13 Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers

There are no costs to respondents beyond those presented in Section A.12. There are no operating, maintenance, or capital costs associated with the collection.

A.14 Estimates of Annualized Costs to the Federal Government

The contract to design and conduct the survey was issued to Fors Marsh Group under contract number CPSC-D-16-0002 for \$243,593.00.

A.15 Explanation for Program Changes or Adjustments

This is a new collection of information.

A.16 Plans for Tabulation and Publication

After the conclusion of the survey, FMG will prepare a draft technical report summarizing the data, findings, and conclusion. In addition, FMG will provide details on the sampling, methodology, and prepare and analyze formatted data (including frequency distributions, cross-tabulations, graphs, tables, and appropriate statistical tests). CPSC staff will review these documents and provide feedback, after which FMG will provide a final version for all documents to CPSC staff.

A.17 Reasons(s) Display of OMB Expiration Date is Inappropriate

This survey instrument is administered orally by telephone and display of expiration date is not possible.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

CPSC is not requesting an exception to the certification requirements.