In-Home Food Safety Behaviors and Consumer Education: Web Survey OMB No. 0583-NEW

Supporting Statement

A. Justification

A.1. Circumstances Making Collection of Information Necessary

The U.S. Department of Agriculture's (USDA's) Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary of Agriculture (7 CFR 2.18, 2.53) as specified in the Federal Meat Inspection Act and the Poultry Products Inspection Act (21 U.S.C. 453 et. seq., 601 et seq.). FSIS protects the public by verifying that meat, poultry, and processed egg products are wholesome; not adulterated; and properly marked, labeled, and packaged.

FSIS's Office of Public Affairs and Consumer Education (OPACE) ensures that all segments of the farm-to-table chain receive valuable food safety information. The consumer education programs developed by OPACE inform the public on how to safely handle, prepare, and store meat, poultry, and processed egg products to minimize incidence of foodborne illness. The FSIS 2017–2021 Strategic Plan addresses the need to conduct research to inform OPACE's efforts to effectively communicate food safety information to consumers: "[t]he agency will continue to extend and expand [these] food safety messages ... [and] ... will conduct research on consumer adoption of safe food handling practices to inform the agency about meaningful ways to explain food safety risks to consumers."

OPACE strives to continuously increase consumer knowledge of recommended food safety practices with the intent to improve food-handling behaviors at home.

OPACE shares its food safety messages through the Food Safe Families campaign (a

cooperative effort of the U.S. Department of Agriculture [USDA], the Food and Drug Administration [FDA], and the Centers for Disease Control and Prevention [CDC]); social media; Ask USDA (an online database of frequently asked food safety questions); the FSIS website; FoodSafety.gov (the cross-federal website operated by FSIS, FDA, and CDC used to promote safe food handling to consumers); the Meat and Poultry Hotline; and various publications, media releases, blogs, and events. These messages are focused on the four core food safety behaviors: clean, separate, cook, and chill.

By testing planned and tailoring existing communication programs and materials, FSIS can help ensure that it is effectively communicating with the public and working to improve consumer food safety practices. As part of OPACE's ongoing activities to develop and evaluate its public health education and communication activities, FSIS is requesting approval for a renewal of an information (Office of Management and Budget [OMB] Control Number: 0583-0178 expiration date: 10/31/2020) collection to conduct web-based surveys of consumers. Findings from the web surveys will provide information on how FSIS communication programs and materials affect consumer understanding of recommended safe food handling practices and insight into how to effectively inform consumers of recommended practices. The results of this exploratory research will be used to enhance communication programs and materials to improve consumers' food safety behaviors and help prevent foodborne illness. Additionally, this research will provide useful information for tracking progress toward the goals outlined in the FSIS 2017–2021 Strategic Plan.

FSIS has contracted with RTI International to conduct two iterations of a webbased survey. The first survey was conducted in fiscal year (FY) 2019, and the second survey, using similar procedures, will be conducted in FY 2021. The questionnaire for the 2021 survey has not yet been developed and will be shared with OMB before conducting the survey.

A.2. How, by Whom, and Purpose Information Is to Be Used

FSIS is using the findings from this exploratory study to address Objective 1.2.3 of the FSIS Fiscal Years 2017–2021 Strategic Plan (USDA, FSIS, 2016), which is to "increase public awareness of recalls, foodborne illness, and safe food handling practices." This objective includes two measures: (1) "% increase in public awareness of safe food handling guidance and recalls through communication channels" and (2) "% increase of consumers identified who follow safe food handling behaviors." The research findings will help inform the development of strategic communication and outreach efforts and evaluate the effect of these activities. By testing new consumer messaging and tailoring existing messaging, FSIS can help ensure that it is effectively communicating with the American public and promoting behavior change with the goals of increasing public awareness of foodborne illness and safe food handling practices and ultimately increasing consumer adherence to the recommended safe food handling behaviors of clean, separate, cook, and chill.

Table A-1 lists the topics that were addressed in the first iteration of the survey and how OPACE is using the survey results. The topics for the second iteration for FY2021 have not been determined yet because it will address emerging food issues of concern to FSIS. Appendix A provides a copy of the survey questionnaire for FY2019; we will submit the questionnaire for FY2021 to OMB for review prior to data collection.

Table A-1. Topics and Use of Results for First Iteration of the Survey

| Topic | How OPACE Is Using the Survey Results |
|---|--|
| Preferences for receiving information on food safety | Inform selection of delivery mechanisms for consumer outreach efforts |
| Awareness, use, and satisfaction with USDA's Meat and Poultry (M&P) Hotline | Evaluate response to USDA M&P Hotline Assess response to likelihood of using USDA M&P hotline if operating hours extended Identify preferences for connecting with USDA M&P hotline |
| Awareness, understanding, and use of USDA press releases on food recalls | Assess existence of recall fatigue (i.e., overexposure to messaging) Evaluate understanding and usability of information provided in recall press releases to motivate action Identify preferences for receiving information on recalls (e.g., delivery mode, frequency, topics) |
| Awareness, understanding, and use of government-provided information on foodborne illness outbreaks | Assess existence of fatigue to public health alerts of foodborne illness outbreaks Determine preference for when information on outbreaks should be shared with consumers (limited vs. more information available on cause of outbreak) |
| Adherence to recommended food safety practices when grilling meat, poultry, or seafood at home | Inform OPACE messaging on how to safely grill meat, poultry, and seafood |
| Adherence to recommended food safety practices when serving food at gatherings and parties | Inform OPACE messaging on how to safely serve hot and cold foods at gatherings and parties |
| Personal or household experience with foodborne illness | Characterize response to foodborne illness Investigate whether there is a relationship between experiencing foodborne illness and food safety behaviors |

Each iteration of the survey will collect information from 2,400 randomly selected English-speaking adult members of a web-enabled research panel referred to as the KnowledgePanel maintained by Ipsos

(https://www.ipsos.com/en-us/solution/knowledgepanel). A random sample of individuals will be selected from the panel for participation in the survey. A pilot will be conducted before the survey to test the survey instrument and procedures.

Unlike opt-in web-based panels that use convenience sampling, the KnowledgePanel is a probability-based panel that is designed to be representative of the U.S. adult population. This representation is achieved through address-based sampling (ABS), where every U.S. adult with an address (including those who do not have a landline phone number) has an equal probability of being selected for participation on the panel. Selected panelists without Internet access are provided with Internet access and a tablet computer, if needed. The KnowledgePanel has some limitations that should be considered when interpreting the survey results. The low recruitment rate for panel participation, panel attrition, and nonresponse among panelists selected to complete a particular survey lead to a very low overall response rate (7%), which may result in nonresponse bias if nonrespondents are systematically different from respondents (Tourangeau, Conrad, & Couper, 2013). Other potential limitations include sampling and coverage issues, nonresponse from breakoffs (i.e., not completing the survey), and measurement error (Tourangeau, Conrad, & Couper, 2013). Because of these limitations, it is not appropriate to make inferences to the U.S. population using results from a probability-based panel survey. Conducting a probability-based survey such as using addressed-based sampling would be cost prohibitive. FSIS has determined that

¹ The KnowledgePanel was formerly owned and maintained by GfK.

conducting a web-based survey will provide sufficient information to inform its consumer outreach efforts.

A.3. Use of Improved Information Technology

The exploratory study will use a web-based questionnaire. Web-based questionnaires not only reduce the burden on participants but also minimize possible administration errors and expedite the timeliness of data processing. Compared with face-to-face interviews, telephone surveys, and mailed surveys, web-based surveys are less intrusive and less costly to administer.

A.4. Efforts to Identify and Avoid Duplication

After the topics have been determined, FSIS will review existing research, including the FDA Food Safety Survey to ensure that the questions in the proposed survey do not duplicate any similar study and that the existing knowledge base and literature do not meet the Agency's informational needs with regard to information needed to inform OPACE's consumer outreach efforts. We will also coordinate with researchers at FDA and CDC to ensure we are not duplicating any of their planned research with consumers.

A.5. Methods to Minimize Burden on Small Business Entities

No small businesses will be involved in this information collection.

A.6. Consequences of Less Frequent Data Collection

FSIS is conducting two iterations of an exploratory web survey; each iteration will collect information on different topics, and a different set of individuals will participate in the survey each year.

Results of the most recent iteration of the Food Safety Survey indicate that some behaviors, such as handwashing and use of separate cutting boards for meat or poultry and produce, have remained constant or decreased in recent years after increasing for several years (FDA, 2016). Thus, there is the continued need to educate consumers about recommended food safety practices to increase knowledge and adoption of recommended behaviors. By conducting this exploratory research, FSIS will have a better understanding of how FSIS communication programs and materials affect consumer understanding of recommended safe food handling practices and will have insight into how to effectively inform consumers of recommended practices.

A.7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5 that Would Cause the 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 3 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 that 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.

This information collection fully complies with 5 CFR 1320.5(d) (2). No special circumstances are associated with this information collection that would be inconsistent with the regulation.

A.8. Consultations with Persons Outside the Agency

In accordance with the Paperwork Reduction Act, FSIS published a 60-day notice requesting comments regarding the renewal of this information collection request (FRN Notice, Volume 85, No. 102, pages 31737-39; 5/27/2020). The Agency received 2 comments, which were both irrelevant to the study and did not require addressing.

The supporting statement for the renewal of this information collection request was reviewed by Sarah Goodale at the National Agricultural Statistics Service. Ms. Goodale had no comments.

We contacted three individuals to complete the first iteration of the survey so we could estimate respondent burden. The names, phone numbers, and length of time to complete the survey is provided below:

Caroline Rains, 919-485-5607, 16 minutes

Michael Hayes, 919-541-5826, 16 minutes

Catherine Viator, 919-597-5127, 20 minutes

This corroborates our estimated burden of 20 minutes. The cognitive interviews (described in Section B, Part 4) provided additional information on respondent burden. We will contact three different individuals to test the length of the second iteration of the survey after it has been developed.

A.9. Payments to Respondents

The sampling frame for the survey is KnowledgePanel, the Ipsos Public Affairs (Ipsos) online consumer panel that is probability based and designed to be representative of the U.S. adult population.

Households without existing computers and Internet access that are invited to participate on the panel are provided a free tablet computer and Internet access in return for their participation. Households with existing computers and Internet access use their own equipment and Internet connection to complete surveys and receive points for completing a survey (1,000 points = \$1). Members can exchange their points for vouchers and gifts from a partner network. Internet panel participants are enrolled into a points program that is analogous to a "frequent flyer" card; respondents are credited with sweepstakes entries or bonus points in proportion to their regular participation in surveys. (For the households provided an Internet device and connection, their incentive includes the hardware and Internet service in addition to the sweepstakes entries and bonus points.) Traditionally, panelists earn sweepstakes entries on some surveys (including surveys more than 15 minutes in length) and bonus points for surveys that are longer or

require special tasks by panel members. Panelists may elect to redeem their points for checks or raffle entries as they accrue them. For the proposed web survey, respondents with existing computers and Internet access receive the equivalent of a \$1 incentive.

A.10. Assurance of Confidentiality

Confidentiality will be assured by using independent contractors, RTI and Ipsos, to collect the information, by enacting procedures to prevent unauthorized access to participant data, and by preventing the public disclosure of the responses of individual participants.

Ipsos has a system of standard operating procedures in place for documenting all processes relating to maintaining confidentiality and privacy of panelists. Although Ipsos collects panel members' contact information for sample selection and panel maintenance, individually identifiable information is not shared with anyone, including RTI and FSIS. Contact information is stored separately from the survey data file and is not linked in any way to participant responses. More specifically, the following data are in three separate databases:

- panel member information
- survey link file (linkage between survey-specific respondent identifier and respondent ID)
- survey data

Ipsos stores all personally identifiable panelist records at its secure data center located near the parent company's corporate headquarters. All data transfers from personal computers (used for survey administration) to the main servers pass through a firewall. Ipsos never provides personally identifiable information to any client or agency

without the explicit and informed consent of panelists. Ipsos will not share personal information regarding panel members with any third party without the participant's permission unless it is required by law to protect their rights or to comply with judicial proceedings, court orders, or other legal processes.

All survey data records are stored separately from panelist information. Ipsos keeps survey data in a secured database that does not contain personally identifiable information. The staff members in Ipsos's Panel Relations and Statistics departments who have access to the personally identifiable information do not have access to the survey response data. The secured database also contains field-specific permissions that restrict access by type of user to prevent unauthorized access.

Ipsos retains the survey response data in its secure database after the completion of each study. These data are retained for operational research, such as analyzing response rates, and for future analysis, statistical adjustments, or statistical surveys that would require resurveying research subjects as part of validation or longitudinal surveys.

Information regarding informed consent, including assurances of data privacy and security, will be provided on the first screen of the survey (see Appendix A). RTI's Institutional Review Board (IRB) reviewed and determined the study is exempt from IRB review (see Appendix C).

RTI and FSIS will not have access to panel members' personal information. No personally identifying information will be included in the data files delivered to the agency. In accordance with the Privacy Threshold Analysis, a Privacy Impact Analysis was prepared, and a System of Records Notice is underway. Further, FSIS has included the FSCRP in the Department's Plan of Action and Milestones (POAM).

A.11. Justification for Questions of Sensitive Nature

The survey does not include any questions that are of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. The survey includes a question on whether any household members have been diagnosed with cancer, diabetes, or other conditions that weaken the immune system. Individuals will not be asked for a specific diagnosis. Immunocompromised individuals are considered at risk for foodborne illness; thus, it is important to collect information from these individuals or their caregivers.

A.12. Estimates of Respondent Burden

The total estimated burden for each iteration of the exploratory web-based survey is 978.18 hours (see Table A-2), for a total burden of 1,956.36 hours for two iterations. The number of respondents for each iteration is 4,546 (146 + 4,400), for a total number of respondents of 9,092 for two iterations.

Table A-2. Estimated Annual Reporting Burden for Each Iteration of the Web Survey

| | Appendix(s) for | | | | | |
|--------------------|-----------------|--------------------|---------------|--------------|-----------|-------------|
| | Data Collection | | Annual | | Hours | |
| | Instrument or | No. of | Frequency per | Total Annual | per | |
| Portion of Study | Form | Respondents | Response | Responses | Response | Total Hours |
| Pretest Invitation | В | 146 | 1 | 146 | 0.03333 | 4.87 |
| | | | | | (2 min.) | |
| Pretest | A | 80^{a} | 1 | 80 | 0.33333 | 26.67 |
| | | | | | (20 min.) | |
| Survey Invitation | В | 4,400 | 1 | 4,400 | 0.03333 | 146.65 |
| | | | | | (2 min.) | |
| Survey | A | 2,400 ^a | 1 | 2,400 | 0.33333 | 799.99 |
| | | | | | (20 min.) | |
| Total | | | | | | 978.18 |

^aA subset of the people who received the invitation.

The annualized cost to all respondents for the collection of information is \$18,722, including fringe benefits (978.18 x \$19.14 per hour x 1.30) (the 2019 U.S.

median hourly wage rate; http://www.bls.gov/oes/current/oes_nat.htm) for the FY2021 iteration of the web survey.

A.13. Capital and Start-Up Costs and Subsequent Maintenance

No capital, start-up, operating, or maintenance costs are associated with this information collection.

A.14. Annual Cost to Federal Government

The estimated total cost to the Federal Government for this information collection is \$170,805 for the second iteration of the web survey. The costs arise from the time spent by the contractor to develop and conduct the exploratory study, analyze the data, and prepare and deliver a final report and includes fringe benefits.

A.15. Reasons for Changes in Burden

This is a renewal of an information collection.

A.16. Tabulation, Analysis, and Publication

The planned schedule for the web survey is shown in Table A-3. We will begin data collection activities after OMB reviews and approves the questionnaire for FY2021. The contractor will provide FSIS a report that summarizes the study methods and results within 90 days of completing the data collection. Appropriate statistical analyses will be used to analyze the survey data. We will produce descriptive statistics for all survey questions and summarize the survey findings in tables and charts. The survey results will not be used to make inferences to the population of all U.S. consumers. OPACE will use the survey results to inform their consumer outreach efforts related to educating consumers on recommended food safety practices.

There are no plans to publish the survey data for statistical use. Dissemination of the study results may include internal briefings, presentations at national conferences, peer-reviewed manuscripts, and reports and posting on FSIS's web site.

Table A-3. Project Schedule

| Date | Activity |
|--|-------------------------------------|
| Within 15 days following OMB approval of the FY2021 questionnaire | Begin data collection activities |
| Within 45 days following OMB approval of the FY2021 questionnaire | Complete data collection activities |
| Within 135 days following OMB approval of the FY2021 questionnaire | Complete summary report |

A.17. OMB Approval Number Display

The OMB approval and expiration date will be displayed on all materials associated with the study. No exemption is requested.

A.18. Exceptions to the Certification

There are no exceptions to the certification.

References:

Food and Drug Administration. (2016). 2016 Food Safety Survey. Retrieved from http://www.fda.gov/downloads/Food/FoodScienceResearch/ConsumerBehaviorR esearch/UCM529481.pdf

Tourangeau, F., Conrad, F. G., & Couper, M. P. (2013). *The science of web surveys*. New York, NY: Oxford University Press.

U.S. Department of Agriculture, Food Safety and Inspection Service. (2016). *Food Safety and Inspection Service (FSIS) 2017–2021 strategic plan*. Retrieved from https://www.fsis.usda.gov/wps/wcm/connect/317d14d6-1759-448e-941a-de3cbff289e5/Strategic-Plan-2017-2021.pdf?MOD=AJPERES