

Food Safety Behaviors and Consumer Education: Focus Group Research

OMB No. 0583-NEW

Supporting Statement

A. Justification

A.1. Circumstances Making Collection of Information Necessary

The Food Safety and Inspection Service (FSIS) has been delegated the authority to exercise the functions of the Secretary (7 CFR 2.18, 2.53), as specified in the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601, et seq.). This statute mandates that FSIS protect the public by verifying that meat products are safe, wholesome, unadulterated, and properly labeled and packaged.

FSIS's Office of Public Affairs and Consumer Education (OPACE) develops consumer education programs concerning the safe handling, preparation, and storage of meat, poultry, and processed egg products to improve consumer food handling behaviors and minimize the incidence of foodborne illness. 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. 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” (U.S. Department of Agriculture, 2016). The proposed focus groups will provide OPACE with information need to inform OPACE’s consumer education and outreach efforts and to develop and disseminate effective messaging to help improve consumer food safety practices and reduce foodborne illness.

OPACE plans to conduct two sets of focus groups with consumers to collect qualitative information on the following topics: (1) consumers’ understanding and response to food recalls and (2) consumers’ understanding and use of manufacturer cooking instructions on not-ready-to-eat (NRTE) meat and poultry products. Focus group research is particularly useful in studies such as this one because the research is exploratory in nature. These findings help provide insight and direction into the topics of interest and provide an understanding of the “why” behind the target audience’s attitudes and behaviors.

FSIS has contracted with RTI International to conduct the two sets of focus groups. The supporting statement describes the topics and methods for the focus groups, and the recruiting materials and moderator guide are provided as appendices. Each set of focus groups will include eight focus groups for a total of 16 focus groups. Each set of groups is described below.

Set 1 Focus Groups: Consumers’ Understanding and Response to Food Recalls

The first set of focus groups (Set 1) will be conducted with English-speaking adults (aged 18 to 64 years old) to learn how consumers understand and respond to food recalls and provide information to inform possible modifications to USDA’s procedures for communicating

information to consumers on recalls. The need for focus group research to address these topics is described below.

The focus group research will address Objective 1.2.3 of the FSIS Fiscal Years 2017–2021 Strategic Plan which is to “*increase public awareness of recalls, foodborne illness, and safe food handling practices*” (U.S. Department of Agriculture, 2016). To date, limited research has been conducted to assess consumers’ understanding of food recalls and consumers’ response to FSIS recall notices and public health alerts. The focus group research will provide OPACE with the information needed to develop and disseminate effective messaging to effectively communicate the call to action (i.e., discard the recalled product or return it to the grocery store) to consumers.

Set 2 Focus Groups: Consumers’ Use of Manufacturer Cooking Instructions

The second set of eight focus groups (Set 2) will be conducted with English-speaking adults to understand how consumers use manufacturer cooking instructions to prepare NRTE meat and poultry products. The need for focus group research to address these topics is described below.

This set of focus groups will also address Objective 1.2.3 of the FSIS Fiscal Years 2017–2021 Strategic Plan to “*increase public awareness of...safe food handling practices*” (U.S. Department of Agriculture, 2016). Additionally, one of FSIS’s food safety research priorities is to “*identify consumer practices which compromise the safety of FSIS regulated products and/or generate data to develop public education and outreach to improve food-handling practices*” (U.S. Department of Agriculture, 2018). To reduce foodborne illness from consumption of undercooked meat and poultry products, FSIS needs to understand how consumers interpret and use manufacturer cooking instructions. The proposed focus groups will provide OPACE with the

information needed to assess whether revisions to FSIS-mandated labeling features are needed to ensure that consumers safely handle and prepare NRTE meat and poultry products.

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

Two sets of focus groups will be conducted, with eight groups per set, for a total of 16 focus groups.

Set 1 Focus Groups: Consumers' Understanding and Response to Food Recalls

The first set of focus groups (Set 1) will be conducted with English-speaking adults (aged 18 years or older) to learn how consumers understand and respond to food recalls and to obtain feedback on consumer response to the current and a revised version of an FSIS recall notice. To increase the homogeneity of the groups, we will segment the groups by education level (four groups with a high school education or less and four groups with some college or a college degree) and age (four groups with people aged 18–35 years and four groups with people aged 36 to 64). The groups will include a mix of consumers who have prior experience responding to a food recall and those who do not have prior experience.

To provide geographic diversity, we will conduct two focus groups in each location, representing the four Census regions: Buffalo, NY (Northeast), St. Louis, MO (Midwest), Richmond, VA (South), and Albuquerque, NM (West). A screening questionnaire will be used to screen participants for eligibility (see Appendix A).

A moderator's guide (see Appendix B) will provide structure for the focus group discussions and ensure that topics of interest are addressed. The moderator guide will address the following topics:

- Respondents' understanding of food recalls:
 - understanding of why foods are recalled

- knowledge of the different types of recalls (pathogen contamination, foreign object contamination, misbranding, undeclared allergen)
- response to having a recalled food at home
- awareness of USDA-recommended action for recalled foods
- perception of different types of recalls (pathogen contamination, foreign object contamination, misbranding, undeclared allergen)
- Response to FSIS food recall alerts:
 - response to one revised version of FSIS food recall alerts: initial impressions, intended message conveyed, suggested revisions
 - response to a second revised version of FSIS food recall alerts: initial impressions, intended message conveyed, suggested revisions
- Response to receiving information on food recalls via the news:
 - recall information used and needed via the news
 - suggestions for disseminating information to consumers

Set 2 Focus Groups: Consumers’ Use of Manufacturer Cooking Instructions

The second set of eight focus groups (Set 2) will be conducted with English-speaking adults to understand how consumers use manufacturer cooking instructions to prepare NRTE meat and poultry products. To increase the homogeneity of the groups, we will segment the groups by education level (four groups with a high school education or less and four groups with some college or a college degree) and age (four groups with people aged 18–35 years and four groups with people aged 36 to 64).

To provide geographic diversity, we will conduct two focus groups in each of the following locations, representing the four Census regions: Buffalo, NY (Northeast), St. Louis,

MO (Midwest), Richmond, VA (South), and Albuquerque, NM (West). A screening questionnaire will be used to screen participants for eligibility (see Appendix C).

The moderator guide will address the topics listed below (see Appendix D).

- Use and understanding of preparation instructions:
 - heating versus cooking instructions
 - responsibility for validation of cooking instructions
 - use of preparation instructions on fresh meat and poultry products
 - use of preparation instructions on processed meat and poultry products
- Response to manufacturer heating/cooking instructions on mock packages for a ready-to-eat (RTE) and an NRTE meat and poultry product:
 - location of information for preparing product
 - information used when preparing product
 - suggested improvements (information to add, remove, or clarify)
 - use of cooking instructions versus Safe Handling Instructions label (NRTE products only)
- Understanding of differences between RTE and NRTE
 - characteristics of meat and poultry products that require cooking for safety versus those that do not
 - how decision is made on whether a product requires cooking for safety

FSIS plans to conduct the focus groups in person during 3rd or 4th quarter 2021 or 1st or 2nd quarter 2022 assuming that RTI, FSIS's subcontractor, is permitted to do so by state, local, and organizational policy, which is based on continuous review of COVID-19 community transmission and adherence to social distancing guidelines.

Procedures will be in place to protect the moderator and participants from being infected with COVID-19 and to prevent the transmission of COVID-19. Recruiting materials will indicate that COVID-19 screening will be part of the screening and eligibility process. Participants who have tested positive for COVID-19 with the past 4 weeks, have symptoms of COVID-19 (including temperature above 100°F), interacted with someone who has been diagnosed with COVID-19, or are age 65 or older will not be eligible to take part in the study. On the day of the focus group, a COVID-19 screening tool will be administered, and participants must pass this screening to take part in the study (Appendix H). The moderator and participants will be required to follow the COVID-19 procedures specifically established for this study (see Appendix I). These procedures include wearing a mask, practicing social distancing, disinfecting in between focus groups.

A.3. Use of Improved Information Technology

To provide information to interpret the study findings, we will audio and video record the focus groups, and the audio-recordings will be transcribed. No electronic copies of the questions will be provided to the participants before the focus group discussions.

A.4. Efforts to Identify and Avoid Duplication

The Agency concluded that the proposed data collection will not duplicate any similar study, and the existing knowledge base and literature do not meet the Agency's informational need.

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

Data will not be collected from small businesses.

A.6. Consequences of Less Frequent Data Collection

This is a one-time data collection. Without this study, FSIS will not have the needed information to effectively communicate with the public and improve consumers' food safety

behaviors. This lack of information would impede the Agency's ability to provide more useful information to consumers to help reduce foodborne illness in the United States.

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 the Office of Management and Budget (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 this information collection request (84 FR 67911 [December 12, 2019]). The Agency received three comments in response to Docket No. FSIS-2019–0026. All three comments were irrelevant to the study.

We contacted nine individuals to test the instrument and estimate respondent burden by conducting two mock focus group discussions. The names, phone numbers, and length of time to take part in the mock focus group for three of these individuals are provided below:

- Rachael Lee, 919-3163871, 80 minutes
- Andrew Freeman, 919-485-2604, 90 minutes
- Megan Carlson, 919-248-1437, 90 minutes

This corroborates our estimated burden of 90 minutes.

A.9. Payments to Respondents

We understand that the OMB guidance about incentives for participation in research is based on the principles of the 2006 memo: Guidance on Agency Survey and Statistical Information Collections. We propose providing each focus group participant a \$75 Visa gift card and a small gift (food thermometer valued at \$5.38 and a magnet valued at \$0.23) so that we can effectively recruit hard-to-find populations, to ensure a high show rate for the focus groups, and to improve data quality. Additionally, participation in focus groups requires substantial commitment and investment of time on the part of the participant in that they must commit to

attend the discussion at a certain time on a specific date. Participation also requires participants to travel to a designated location, with the average commuting time in U.S. metropolitan areas estimated at about 26.1 minutes (U.S. Census Bureau, 2017) and may also require that the participant obtain childcare for a fee (for the participants who may have children). Thus, incentives have long been considered a standard practice in conducting qualitative research such as focus groups.

Table A-1 provides information on the cost to participate in the focus group discussion. Although the cost to participate varies depending on whether the participant needs childcare for their child while attending the focus group (from \$30.02 to \$74.72), we propose to offer all participants the same incentive amount (\$75) to avoid introducing selection bias that might occur by offering different incentive amounts to different subpopulations. The proposed \$75 incentive amount is in line with the industry standard. These industry-standard stipends help ensure that respondents can be recruited efficiently and ensure their arrival and participation in the groups. These standards also exist to provide fair compensation for costs incurred by participants while attending groups (i.e., travel and childcare expenses). In addition to covering reasonable costs of participation, payment to participants is necessary to ensure that a sufficient number of respondents from the target populations participate in the study. Payment to participants must encourage potential participants to agree to allocate their time to the focus group discussion and maintain that commitment on the day of the research.

Table A-1. Estimated Cost to Participants of Taking Part in the Focus Group Discussion by Whether the Participant Needs to Retain Childcare

Cost Component	Estimated Number of Units	Unit Cost	Total Cost
Households with Children			
Cost to travel to/from facility	52.2 miles ^{a,b}	\$0.575/mile ^c	\$30.02
Cost of childcare during travel time (1 hour round trip) and attending the focus group (15 minutes before appointment to park; 90-minute discussion; and 15 minutes after group to checkout, receive incentive, and return to vehicle)	3.0 hours	\$14.90/hour ^d	\$44.70
Total			\$74.72
Households without Children			
Cost to travel to/from facility	52.2 miles ^{a,b}	\$0.575/mile ^c	\$30.02
Total			\$30.02

^a Source: <https://www.census.gov/library/visualizations/interactive/travel-time.html>

^b The average commute in a U.S. metropolitan area is an estimated 26.1 minutes to a designated location. Assuming participants travel 60 miles per hour, the total number of roundtrip miles is 52.2 miles.

^c Source: <http://www.gsa.gov/portal/content/100715>

^d Source: <https://www.care.com/c/stories/2423/how-much-does-child-care-cost/>. 2018 hourly rate for nanny, in-home care.

Offering no incentive or a smaller incentive could potentially exclude sections of the population who cannot attend the groups, either because of the cost of childcare or travel or the cost of missing work. Excluding sections of the population would limit the qualitative information that would be gained through the focus group discussion and potentially bias the information needed to address the research questions of interest, thus negatively affecting data quality.

Moreover, the \$75 incentive payment proposed is consistent with what OMB has approved for other 90-minute focus group studies, for example, OMB No. 0583-0173: *Food Safety Behaviors and Consumer Education: Focus Group Research*; OMB No. 0583-0166:

Professional Services to Support Requirement Gathering Sessions for SHI; and OMB No. 0583-0141: Consumer Research, Assessing the Effectiveness and Application of Public Health Messages Affecting Consumer Behavior Regarding Food Safety.

To encourage recruited individuals to not only attend but to arrive on time for the focus group discussions, we will include all those who sign in 15 minutes before each group is scheduled to start in a drawing for a chance to win an extra \$25 (in the form of Visa gift card). We anticipate that without the incentive and drawing, we would need to screen more people to achieve the desired cooperation rate. The current estimated annualized burden for the participant screening is about 170.24 hours. Without the incentive, we expect the burden to be approximately 425 hours, an increase of approximately 150%. The cost to respondents and the federal government would increase accordingly.

A.10. Assurance of Confidentiality

The privacy of the focus group participants will be ensured by using an independent contractor (RTI) to collect the information, by enacting procedures to prevent unauthorized access to respondent data, and by preventing the public disclosure of the responses of individual participants.

The only Information in Identifiable Form (IIF) that will be obtained is the participants' names, phone numbers, and email or mailing addresses for sending confirmation letters and making reminder phone calls. This IIF will be maintained at each of the local market research firms in their own proprietary files. These personal identifiers will not be linked to data and will not be shared with FSIS or RTI. The only IIF that RTI will obtain is the participants' names via the signed informed consent. These data will not be shared with FSIS.

Participation in the focus groups is voluntary, and participants will be advised that their responses will be treated in a secure manner and will not be linked to their names. During the focus groups, only first names will be used. The focus group discussions will be transcribed for use by the RTI research team in developing a report, but participants' first names will be replaced with the word "participant." The digital audio and video files will be stored on a password-protected share drive, accessible only to RTI project staff and destroyed after 5 years.

FSIS staff may view the focus groups in person (by watching from an observation room through a one-way mirror). RTI will deliver the transcripts of the focus group discussions (with no identifying information) to FSIS via email. FSIS will not have access to the digital audio and video files of the focus group discussions.

Assurances of data privacy and security are documented in the informed consent form (see Appendix E for Set 1 focus groups and Appendix F for Set 2 focus groups). The study protocol and instruments were reviewed by RTI's Institutional Review Board (see Appendix J).

RTI and FSIS will not have access to focus group participants' 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.

A.11. Justification for Questions of Sensitive Nature

During the focus group discussions, participants will not be asked any questions that are personal or sensitive in nature.

A.12. Estimates of Respondent Burden

For the 16 focus groups, it is expected that 1,280 individuals will complete the screening questionnaire, and it is assumed that 160 will be eligible and subsequently agree to participate in the focus group study (10 people per group). Each screening questionnaire is expected to take 8

minutes (0.133 hour). Participating in the focus group discussion will take a total of 90 minutes (1.5 hours). Table A-2 details the estimated annual reporting burden. The estimated annual reporting burden for the 16 focus groups is 410.24 hours, which is the sum of the burden estimates for the screening and focus group discussion.

Table A-2. Estimated Annual Reporting Burden for the Focus Group Study (16 groups)

Portion of Study	No. of Respondents	Annual Frequency per Response	Total Annual Responses	Hours per Response	Total Hours
Screening questionnaire	1,280	1	1,280	0.133 (8 min.)	170.24
Focus group discussion	160	1	160	1.5	240
Total					410.24

The annualized cost to all respondents for collecting the information is \$7,851.99 (410.24 x \$19.14) at \$19.14 per hour, including fringe benefits. The hourly rate for the respondents was attained from the Department of Labor Bureau of Labor and Statistics wage data, May 2019.

A.13. Capital and Start-Up Cost 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, including fringe benefits, for this information collection is \$154,643. The costs arise from the time spent by the contractor to develop and conduct the study, analyze the data, and prepare and deliver a final report.

A.15. Reasons for Changes in Burden

This is a new information collection.

A.16. Tabulation, Analysis, and Publication

The planned schedule for this information collection is shown in Table A-3 for the focus groups. It will take up to 90 days to recruit individuals and conduct the 16 focus groups. RTI will provide FSIS a summary report of the focus group discussions within 90 days of the last focus group. No statistical analyses will be conducted, and there are no plans to publish the data for statistical use. Dissemination of the study results may include internal briefings, presentations, and reports and posting on FSIS's Web site.

Table A-3. Project Schedule for Focus Groups

Date	Activity
90 days to conduct focus groups (3 rd or 4 th quarter 2021 or 1 st or 2 nd quarter 2022)	Conduct 16 focus groups
90 days after last focus group	Completion of focus group summary report for each set of focus groups

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

U.S. Census Bureau. (2017). Average one-way commuting time by metropolitan areas. Retrieved from <https://www.census.gov/library/visualizations/interactive/travel-time.html>

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

U.S. Department of Agriculture. (2018). Food Safety and Inspection Service (FSIS) strategic plan 2017-2021. Washington, DC: U.S. Department of Agriculture. Retrieved from <https://www.fsis.usda.gov/wps/portal/fsis/topics/science/food-safety-research-priorities>