

Supporting Statement A

A1. Circumstances Making the Collection of Information Necessary

The Consumer Product Safety Commission (CPSC) requests Office of Management and Budget (OMB) approval of a quantitative survey project to test which online safety warning label is most effective.

CPSC is charged with protecting the public against hazards associated with consumer products. To target specific threats, and advance programs that would mitigate the risk of hazards related to products, CPSC conducts research to develop communication recommendations to convey the hazard information. According to CPSC data, emergency departments across the United States treated approximately 224,200 toy-related injuries in 2019, of which 35 percent were for cases involving children younger than 5 years of age (Qin, 2020). Age-appropriate toy selection using safety-related information has the potential to prevent some of these injuries (Argo & Main, 2004). Research suggests that caregivers may not notice or seek out safety information, or rely on it when making purchasing decisions when examining toy packages in person (Argo & Main, 2004). However, gaps in the literature remain on how caregivers of young children interact with online safety-related information when purchasing items via the Internet. As such, CPSC staff concludes that it is critical that consumers understand the safety warning labels on children's toys to reduce the incidence of toy-related injuries among young children in the future.

CPSC staff seeks a better understanding about which warning labels are most effective. Caregivers perceive warning labels as containing repetitive, non-specific information, and often used as a tactic by manufacturing companies to protect themselves from liability. Additionally, caregivers are inundated with safety messaging that changes constantly, resulting in ambiguity about what messages are most relevant and current. Frequently, caregivers listen to friends and family, or rely on past experience to decide what products are safe for their child, rather than follow the guidelines recommended by experts. Additionally, product marketing and new products pose a risk for consumers, as well. If caregivers are not attuning to the safety messaging on new products, they are more likely to use the products incorrectly.

Certain cautionary statements about choking hazards with small parts, balloons, small balls, and marbles are required on product packaging. For websites that provide direct means for purchasing shall also include the appropriate cautionary statement displayed on, or immediately adjacent to that advertisement, in conspicuous and legible type, in contrast by typography, layout, or color with other material printed or displayed in such advertisement.

CPSC staff seeks further understanding of the consumer response of online safety warning labels. Ultimately, CPSC staff may use the findings to help refine and enhance online safety warning labels to convey critical information effectively about product warnings in the future. This work will serve to further CPSC's overall mission of protecting the public against dangers associated with consumer products.

A2. Purpose and Use of Information Collections

Information obtained through this project will not be tied directly to any policy decisions regarding warning labels. Rather, information from this project will inform CPSC about caregiver perceptions and comprehension of warning label language and placement. CPSC staff may use findings from this effort in conjunction with findings from other phases of this research to assist with providing recommendations for refining and enhancing online warning labels in the future. Survey respondents will answer questions related to online toy purchasing, and they will view safety warning labels which will inform CPSC staff about consumer message comprehension, consumer motivation to follow instructions, and the effectiveness of warning labels in conveying hazard information, and whether caregivers notice these warning labels when purchasing toys for their child.

CPSC has contracted with FMG to develop and execute this project on behalf of CPSC. The project will consist of an online survey with caregivers age 18 and above. Eligibility criteria (which can be found in the screener attachment) specifies that: all individuals will be caregivers (*e.g.*, parent or guardian) of a 2-to-3-year-old child, because CPSC staff is interested in assessing labels for products that are intended for this age range. CPSC is interested in responses from primary caregivers only. To be an eligible caregiver, the caregiver must be a parent or guardian of a 2-to-3-year-old child, and the child must reside in the caregiver's home at least 40 percent of the time.

Information obtained through this project is not intended to be nationally representative.

Survey

All respondents will be invited to join the study through a partnering panel provider, Prodege. The panel provider will contact members from their panel who fit the eligibility criteria for the survey through an invitation email that invites them to take part in the survey. Invited individuals will be sent reminder emails to encourage them to take the survey. The number and frequency of reminder emails is dependent upon survey fielding progress, but typically, respondents will receive a reminder email about once a week. Potential respondents invited to take the survey will first complete the online screening questionnaire, which will take approximately 2-3 minutes to complete. After completing the screening questionnaire,

respondents who qualify for the study will be directed to an informed consent page. If they choose to consent and participate, they will be directed to the main questionnaire.

A3. Use of Improved Information Technology and Burden Reduction

Prodege¹ will recruit for the survey and conduct the survey online.

Online consumer surveys are considered low-burden collections. Participation in the survey is voluntary.

A4. Efforts to Identify Duplication and Use of Similar Information

To our knowledge, neither CPSC, nor any other agency or organization, has conducted a comprehensive study to gather quantitative data on knowledge and awareness regarding the specific hazards of interest (namely, understanding caregiver toy purchasing behavior and determining whether caregivers notice and/or adhere to the safety warning label) in this data collection.

A5. Impact on Small Businesses or Other Small Entities

Respondents in this project will be members of the general public and not business entities. CPSC staff does not anticipate any impact on small businesses or other small entities.

A6. Consequences of Collecting the Information Less Frequently

This effort is a one-time data collection. Without the information collection requested for this project, CPSC staff could face difficulties in developing effective strategies and best practice approaches for delivering product safety warnings to caregivers of 2-to-3-year-olds. Failure to collect this information could prevent CPSC staff from making effective changes to online warning labels in the future. CPSC staff has carefully considered the project design to balance effectively the information collection objectives with participant burden.

A7. Special Circumstances Relating to the Guidelines of 5 CFR Section 1320.5

This request complies with Title 5 of the Code of Federal Regulations (5 CFR) section 1320.5.

¹ <https://www.prodege.com/>.

A8. Consultation and Public Comments

Part A. Public Notice

A 60-Day Federal Register Notice (FRN) for the collection published on June 24, 2021. The 60-Day FRN citation is 86 FR 33239.

CPSC received one comment in response to the June 24, 2021 notice. The commenter stated support for the research; however, raised concern that the small sample size of 250 will not provide enough information and stated that an increased sample size such as 500 would provide more insights.

Commenter also suggested that efforts be made to get a diverse range of shoppers in the sample, both in terms of income, race, and other demographic information, but also in terms of familiarity with shopping and purchasing online. The commenter believes that first-time shoppers for an online children's product will have different responses from regular online shoppers. Furthermore, the commenter recommends that CPSC look to garner information on different types of products parents shop for online, while conducting the survey.

CPSC considered the comment and made modifications to increase the sample size of the survey to 750. Staff also reiterates that the participants will be screened to ensure the selection of a sample that varies on income, education, age, age of their child(ren), and other parameters. The panel provider will also monitor respondents to ensure that underserved populations are represented in the sample and that insights are collected from a diverse population.

CPSC will differentiate results between first-time and regular online shoppers. At this time, CPSC will be unable to garner information on the different types of products parents shop for online, but may consider additional research to collect this information in the future.

Part B. Consultation

CPSC has consulted with FMG. Specifically, FMG has helped inform CPSC's decisions regarding the availability of the requested information, data collection techniques, and the clarity of information and instructions provided to participants.

A9. Explanation of Any Payment or Gift to Respondents

For taking the survey, respondents will receive proprietary internal currency through the panel provider. Swagbucks are virtual currency that can be redeemed to purchase gift cards. Swagbucks have a 100 to 1 redemption value. For example, 50 Swagbucks are equivalent to

\$0.50. For this study, participants will earn Swagbucks equivalent to about \$1 for completing the survey.

Because participants often have competing demands for their time, incentives are used to encourage participation. The use of incentives treats participants justly and respectfully by recognizing and acknowledging the effort they expend to participate. When applied in a reasonable manner, incentives are not an unjust inducement but an acknowledgement of respondents' participation (Halpern, et al., 2004).

Incentives must be high enough to equalize the burden placed on respondents for their time and cost of participation (Russell et al., 2000), as well as provide enough motivation for them to participate in the project. If the incentive is not adequate, participants might agree to participate and drop out early.

Additionally, inadequate incentives can cause a difficult and lengthy recruitment process that, in turn, can cause delays in launching the information collection, which can lead to increased costs. Incentives are also necessary to ensure adequate representation among harder-to-recruit populations, such as low socio-economic groups and high-risk populations (Groth, 2010).

A10. Protection of the Privacy and Confidentiality of Information Provided by Respondents

FMG will collect all information for this project with an assurance that the respondents' responses and data will remain private to the extent allowable by law. FMG is using a panel for this data collection and will collect the respondents' self-reported state. Contact information, such as names, addresses, email addresses, or telephone numbers will not be collected. The consent form contains a statement emphasizing that no one can link a participant's identity to their responses and that each participant can only be identified by a unique ID. FMG will encrypt all data in transit. Finally, FMG will operate and maintain all equipment according to industry standard practices, and validate all software using industry standard quality assurance practices.

Independent contractors will not share personal information regarding participants 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, a court order, or other legal process. All project information received by the CPSC will remain in a secured area. No project information will contain identifying information.

A11. Institutional Review Board (IRB) and Justification for Sensitive Questions

The survey does not include any questions considered especially sensitive in nature, although we will collect respondent's ethnicity, ages of their children, and annual household income to determine the potential for non-response bias.

A12. Estimates of Annualized Burden Hours and Costs

Table A12.1 estimates the time burden and costs to respondents. The online survey for the proposed study will take approximately 15 minutes (0.25 hours) to complete and consist of 750 respondents.

Table A12.1. Estimated Annualized Burden Hours: Survey

| Project Activity | Number of Respondents | Frequency of Response | Time Burden of Response (hours) | Total Hours | Respondent Cost |
|---------------------|-----------------------|-----------------------|---------------------------------|-------------|-----------------|
| | (A) | (B) | (C) | (D=AxC) | (Dx\$38.60) |
| Copy Testing Survey | 750 | 1 | 0.25 | 187.50 | \$7,237.50 |

The U.S. Bureau of Labor Statistics estimates the cost of employee compensation for civilian workers averaged \$38.60 per hour worked in December 2020 (Table 2. Employer Cost for Employee Compensation for civilian workers by occupational and industry group, <https://www.bls.gov/ect>). Therefore, the respondent burden for the collection is estimated to cost \$7,237.50 (\$38.60 per hour × 187.5 hours).

A13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

Respondents bear no costs to participate other than their time.

A14. Annualized Cost to the Government

The total cost of this collection to the federal government is \$152,712. This represents 9 months of staff time annually. This amount includes federal employee salaries and benefits. No travel costs are associated with the collection. This estimate uses an annual total compensation of \$138,866 (the equivalent of a GS-14, Step 5 employee, in the Washington D.C. area, in 2021), which represents 68.2 percent of the employer costs for employee compensation, with the remaining 31.8 percent added for benefits (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” December 2020, Table 2,

percentage of wages and salaries for all civilian management, professional, and related employees), for total annual compensation per FTE of \$203,616.

A15. Explanation for Program Changes or Adjustments

This is a new information collection.

A16. Plans for Tabulation and Publication and Project Time Schedule

FMG will develop a technical report summarizing the findings from the project after the survey has fielded. CPSC staff will use the findings with findings from other phases of this research to assist CPSC staff with providing recommendations for refining and enhancing warning labels in the future.

Table A16.1 outlines the project timeline.

Table A16.1. Project Timeline

| Item | Timeline |
|---|----------------------------------|
| Survey Fielding | Within 1 month of OMB approval |
| Conduct Data Analysis and Submit Draft Report | 7 weeks after survey completion |
| Final Summary Report | 10 weeks after survey completion |

A17. Reason(s) Display of OMB Expiration Date Is Inappropriate

The display of the OMB expiration date is not inappropriate.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.

REFERENCES

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Russell, ML., Moralejo, DG., Burgess, ED. (2000). Paying research subjects: Participants' perspectives. *Journal of Medical Ethics*, 26(2), 126–130.

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