

A. 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 collect information from consumers on their beliefs and behaviors in relation to product safety and product safety messaging. The CPSC is charged with protecting the public from dangers associated with consumer products. To target specific hazards and advance programs that would mitigate the risk of dangers related to products, CPSC conducts research to develop communication recommendations to influence positive behavioral change. The purposes of this survey are to assist CPSC staff in: (1) identifying psychological and behavioral factors to consider in CPSC staff's assessment of product safety, and (2) resolving psychological and behavioral concerns for product safety, including improvements to hazard communication. By conducting an online survey, CPSC staff seeks a better understanding of the mechanisms and types of safety messages that consumers receive, how they respond, and what affects their response. Specifically, responses to the items in this survey will provide CPSC staff with information on whether consumers read and comply with various types of safety information that comes with products they use; the causes of consumer noncompliance with product safety information; whether consumers share product safety information with other users of their products;; what sources of information they rely on to decide if a product is safe to use; whether safety is a priority in their purchasing decisions; how they responded to safety notices and recalls in the past; reasons for noncompliance with safety notices and recalls; and if and how the product type affects their risk perception and behaviors. This survey also assesses tool ownership, which informs CPSC staff's consideration of recall repairs that require the use of tools.

The survey items were selected, in part, to investigate existing research on hazard communication and behavioral responses. According to research, for products that are simple and familiar to use, consumers are less likely to pay attention to safety information and less likely to read instructions.¹ The survey results will help us understand the differences between product types, sources of information, and methods of purchasing, as well as how those differences may influence consumers' perceptions of risk and their responses. For example, once we know the most influential sources of information that consumers use to make a purchasing decision, we will look for ways to communicate the hazard more effectively to improve the chances that the safety messaging will be noticed and followed.

¹ Godfrey, S. S., Allender, L., Laughery, K. R., Smith, V. L. (1994). Warning Messages: Will the consumer bother to look? In *Human Factors Perspectives on Warnings*, by K. R., Wogalter M. S., Young, S. Laughery, pp. 53-57.

When responding to a recall notice and performing the actions recommended by the manufacturer to make the product safer, consumers consider “cost of compliance”; that is, they consider the time and effort to comply with the recommendations.² Survey results will give us information that we need to consider while approving a manufacturer-proposed repair action. For example, once we know the top reasons for not complying with a recall notice, we will focus on those issues; and if product type is making a difference, we may need to apply different strategies to get consumers to heed a recall.

CPSC staff is aware of a recent qualitative research exploring UK consumers’ attitudes and behaviors regarding product safety. However, CPSC staff cannot readily use the results of this research because the participants were limited to UK consumers.³ See the Select References list at the end of this document for additional resources.

A2. Purpose and Use of Information Collections

In this proposed survey, CPSC staff will expand on existing research and acquire current information about consumer product use, including, but not limited to, the following:

- consumers’ beliefs, experiences, and tendencies regarding product safety;
- whether consumers pay attention to instructions that come with products;
- do consumers read safety information and labels;
- to what extent consumers comply with safety messages;
- how product type influences consumers’ attitude and behavior;
- what information resources consumers rely on before buying a product;
- how product safety ranks among other factors consumers consider;
- reasons consumers comply or do not comply with the safety messages; and
- how consumers respond if they encounter a safety recall of the product they own.

Information obtained through this project is not intended to be nationally representative and will not be directly tied to any policy decisions regarding safety communication. CPSC staff intends to use the study findings to identify potential factors to consider in the analysis of the safety of consumer products. Ultimately, this work will serve to advance CPSC’s mission of protecting the public against dangers associated with consumer products.

The project will consist of an online survey with individuals age 18 and above. Participants will be limited to residents of the United States only. Recruitment will be based on following

² Riley, D. M. (2006). Beliefs, attitudes, and motivation. In M. S. Wogalter (Ed.), *Handbook of Warnings* (pp. 289-300). Mahwah, NJ: Lawrence Erlbaum Associates.

³ <https://www.gov.uk/government/publications/consumer-attitudes-to-product-safety>.

gender quotas: Female (50%), Male (50%); and the overall sample will be distributed across the following regions: Midwest (~20%), Northeast (~20%), South (~40%), West (~20%). Ethnicity of participants will be monitored in line with the following criteria: Non-Hispanic White (~66%), Non-Hispanic Black (~12%), Hispanic (~12%), and Other (~10%).

To do this, CPSC's contractor, Carahsoft/Qualtrics, will partner with one online sample provider to supply a network of diverse, quality respondents. Carahsoft/Qualtrics' sample partner will randomly select respondents for surveys where respondents are likely to qualify. Respondents are invited to surveys in various ways. Often, potential respondents are sent an email invitation informing them that the survey is for research purposes only, indicating how long the survey is expected to take, and explaining what incentives are available. Members may unsubscribe at any time. Other times, respondents will see surveys they are likely to qualify for upon signing into a panel portal. Other common invitation methods include in-app notifications and SMS notifications. To avoid self-selection bias, survey invitations do not include specific details about the contents of the survey and instead, they are kept very general.

A3. Use of Improved Information Technology and Burden Reduction

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

A4. Efforts to Identify Duplication and Use of Similar Information

To our knowledge, CPSC has never conducted a comprehensive study to gather data on consumer risk perception and response to hazard communication in general. With the following exceptions, the survey items do not duplicate previous research: the item provides necessary context, existing information is outdated, existing information is not reliably applicable to US consumers,⁴ or a combination of these factors.

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.

⁴ For example, CPSC staff is aware of similar survey research into tool ownership; however, it is specific to the U.K. and may not accurately represent U.S. households: <https://www.statista.com/statistics/488288/diy-tools-ownership-united-kingdom-uk/>.

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 safety communications. Failure to collect this information could prevent CPSC staff from making effective changes to safety communications in the future, which in turn, could decrease safe behaviors. CPSC staff has considered the project design to balance effectively the information collection objectives with participant burden.

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

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

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Part A. Public Notice

A 60-Day Federal Register (FR) Notice for the collection published on July 26, 2021. The 60-Day citation is 86 FR 40018. No comments were received during the 60-Day comment period.

Part B. Consultation

CPSC staff consulted the following individuals outside of the agency on project design and material development:

Contact for consultative SME services:

Michaela Beckenbach, Principal Research Manager, Research Services
michaelab@qualtrics.com

No major unresolved problems stem from this consultation.

A9. Explanation of Any Payment or Gift to Respondents

Respondents will receive no more than \$2 worth of compensation, which can be in the form of cash, gift card, or reward program credits. The form of the reward provided is chosen by the respondent, based on their individual preference from those options made available by the panel provider.

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

Contractor 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. The consent form contains a statement emphasizing that no one can link a participant’s identity to his/her responses and that each participant can only be identified by a unique ID. Contractor will encrypt all data in transit. Contractor 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 information about the respondents’ gender, ethnicity, age group, annual household income, and education level 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 minutes⁵ (0.25 hours) to complete, and it will consist of a maximum of 5,000 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)
Online Survey	5,000	1	0.25	1,250	48,250

Respondents bear no costs to participate, other than their time.

⁵ When tested by seven survey takers, the average time to complete the survey was 6 minutes.

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 \$48, 250 (\$38.60 per hour × 1,250 hours).

A13. Annualized Cost to the Government

The total cost of this collection to the federal government is \$150,978. 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 \$137,491 (the equivalent of a GS-14 Step 5 employee, in the Washington D.C. area), which represents 68.3 percent of the employer costs for employee compensation, with the remaining 31.7 percent added for benefits (U.S. Bureau of Labor Statistics, “Employer Costs for Employee Compensation,” March 2020, Table 2, percentage of wages and salaries for all civilian management, professional, and related employees), for total annual compensation per FTE of \$201,305.

A14. Explanation for Program Changes or Adjustments

This is a new information collection.

A15. Plans for Tabulation and Publication and Project Time Schedule

Contractor will develop a technical report summarizing the findings of 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 making recommendations on how to enhance safety communications.

CPSC requested OMB approval for 1 year. Table A16.1 outlines the project timeline.

Table A16.1. Project Timeline

Item	Timeline
Begin data collection	8 weeks after OMB approval
Finalize data collection	18 weeks after OMB approval
Transmit data to CPSC along with report	22 weeks after OMB approval

A16. Reason(s) Display of OMB Expiration Date Is Inappropriate

The display of the OMB expiration date is not inappropriate.

A17. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.