SUPPORTING STATEMENT FOR

"GENERIC CLEARANCE

FOR THE DEVELOPMENT OF NUTRITION EDUCATION MESSAGES

AND PRODUCTS FOR THE GENERAL PUBLIC"

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Appendices

Terms of Clearance: Include a terms of clearance section if this is an existing collection and the Notice of Action (NOA) has terms of clearance that must be addressed. Otherwise, delete this section.

CNPP plans to adhere to the Terms of Clearance:

Previous terms continue: This generic ICR is approved on the understanding that: 1) ICs under this generic clearance will not overlap with ICs under other FNS generic clearances; 2) to the extent that FNS and FDA both conduct studies related to MyPyramid (currently named MyPlate) and/or the Dietary Guidelines, FNS and FDA will coordinate their IC activities and share information with each other so as not to duplicate ICs and impose unnecessary burden on the public; 3) respondents will not be asked to respond to these ICs more than quarterly; 4) CNPP will continue to use screening measures when conducting random sampling to ensure that individual members of the public are not included in multiple studies within designated periods of time; 5) because it is unclear if FNS has the statutory authority to provide assurances of confidentiality, FNS will not use the term "confidential" in any materials provided to respondents and will instead use terms like "private to the extent permitted by law"; 6) FNS will submit individual ICs to OMB as they are implemented, along with all necessary supporting statements and burden estimates. OMB will aim to conclude review within 14 days. However, FNS should not assume individual ICs have received OMB approval until FNS has received such approval explicitly, even after 14 days have elapsed.

A1. Circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Delegated Authority and Mission of the Center for Nutrition Policy and Promotion

This is an extension of a currently approved data collection. The title of this information collection package will remain Generic Clearance for the Development of Nutrition Education

Messages and Products for the General Public.

The Food and Nutrition Service (FNS) Center for Nutrition Policy and Promotion (CNPP) of the U.S. Department of Agriculture (USDA) conducts consumer research to identify key issues of concern related to the public understanding the consumer translation of key guidance from the *Dietary Guidelines for Americans 2020-2025* (*Dietary Guidelines* or *Guidelines*) (Appendix 1) into consumer messages, tools and resources.

As background, the *Dietary Guidelines* is a primary source of dietary health information in the form of technical publication written for use by professional audiences, not consumers. Users include Federal agencies, health professionals, policy makers, and nutrition educators. Issued jointly by the USDA and Health and Human Services (HHS) every five years, the *Dietary Guidelines* serve as the cornerstone of Federal nutrition policy and form the basis for these agencies' development of consumer nutrition education efforts (nutrition messaging and development of consumer materials).

Translation of key guidance from the technically written *Dietary Guidelines* into consumer messages and resources is essential so that the public has resources to help them make healthier eating choices. After the release of the *2010 Dietary Guidelines* for use by professional audiences, a consumer communication initiative built around USDA's new MyPlate icon, including the resources at www.ChooseMyPlate.gov (now renamed to www.MyPlate.gov), was launched. MyPlate is a visual cue supported by messages and resources to help consumers make better food choices; these consumer materials are consistent with the current *Dietary Guidelines*. It illustrates the five food groups and uses a familiar mealtime visual, a place setting, to prompt Americans to eat more healthfully. Information collected from consumer research will be used in further development of consumer nutrition messages and related resources to be communicated through

MyPlate.

These may include:

1. Messages and resources that help consumers make healthier food choices, grounded in the latest *Dietary Guidelines*;
2. Additions and enhancements to the www.MyPlate.gov website;
3. Materials relaying consumer messages supporting MyPlate, grounded in the latest *Dietary Guidelines*, for special population groups; and
4. New policy, messages, resources, and tools that might be developed as a result of the most current *Dietary Guidelines*, as well as the most currently available technologies.

CNPP works to improve the health and well-being of Americans by developing and promoting dietary guidance that links scientific research to the nutrition needs of consumers across the lifespan.

CNPP has among its major functions the development and coordination of nutrition guidance within USDA and is involved in the investigation of techniques for effective nutrition communication. Under Subtitle D of the National Agriculture Research, Extension, and Teaching Policy Act of 1977 (7 U.S.C. 3171-3175) (Appendix 2), the Secretary of Agriculture is required to develop and implement a national food and human nutrition research and extension program, including the development of techniques to assist consumers in selecting food that supplies a nutritionally adequate diet. Pursuant to 7 CFR 2.19(a)(3) (from Appendix 2), the Secretary of Agriculture has delegated authority to CNPP for, among other things, developing materials to aid the public in selecting food for good nutrition; coordinating nutrition education promotion and professional education projects within the Department; and consulting with the Federal and State

agencies, the Congress, universities, and other public and private organizations and the general public regarding food consumption and dietary adequacy.

Under Section 301 of Public Law 101-445 (7 U.S.C. 5341, the National Nutrition Monitoring and Related Research Act of 1990, Title III) (Appendix 3) the Secretaries of USDA and HHS are directed to publish the *Dietary Guidelines for Americans* jointly at least every five years. The law instructs that this publication shall contain nutritional and dietary information and guidelines for the general public, shall be based on the preponderance of scientific and medical knowledge current at the time of publication, and shall be promoted by each Federal agency in carrying out any Federal food, nutrition, or health program. The recent edition of the *Dietary Guidelines* expanded from providing dietary advice for Americans ages 2 years and older to providing dietary advice for Americans from birth through older adulthood, including people who are pregnant. The Agricultural Act of 2014 mandated the addition of dietary guidance for women who are pregnant and infants and toddlers from birth to 24 months of age beginning with the 2020 edition. By translating the *Dietary Guidelines* into consumer-friendly nutrition education communication materials, CNPP and partnering agencies are able to help Americans make better or healthier food and beverage choices that can help improve health. One of the primary ways CNPP helps Americans apply the nutrition guidance in their daily lives is by developing and maintaining interactive, digital tools. CNPP's digital resources and tools provide hands-on learning opportunities that empower Americans to think critically about their food and health choices. Maintaining and enhancing CNPP's digital resources and tools are key in reversing the trend of childhood obesity and building a healthier next generation.

USDA's MyPlate icon is supported by a robust consumer nutrition education program to assist Americans in selecting foods for a dietary pattern that is consistent with the *Dietary*

Guidelines. Ensuring that MyPlate resources and related tools are useful to intended audiences is critical to CNPP's work and is a major activity included in its 5-year strategic plan in fulfillment of the Government Performance and Results Act of 1993 (31 U.S.C. 9701) (Appendix 4).

Justification for data collection

The approval of information collection is necessary to obtain input into the development of educational messages, materials and tools grounded in the *Dietary Guidelines* and supporting MyPlate, which targets the general public.

This clearance request describes data collection activities related to obtaining consumer feedback via various avenues which could include a limited set of focus groups, qualitative interviews, ethnographic studies, Web-based surveys, or other forms of gathering information based on availability of emerging technologies. Consumer feedback on clarity, understandability, and acceptability of messages and materials related to MyPlate and other healthy eating content during the product development stage will be gathered.

Other types of activities could be related to Market Research (segmentation, trends, etc.) performed through environmental scans, customer analysis, competitor analysis, and reach or impact analysis. According to OMB guidance regarding generic clearance, individual memos explaining the exact method for information collection will be submitted as well as copies of the tools or instruments to be used in gathering the data.

Every five years the *Dietary Guidelines*, written for professional audiences, are revised based on the evaluation of any new scientific information that might be available related to nutrition, health, diet and food consumption patterns. A simultaneous evaluation of consumer resources and tools to implement and communicate the *Dietary Guidelines* takes place in order to

ensure that nutritional goals remain accurate and that consumers are being provided with useful advice.

An essential part of the reassessment process is to conduct formative research with consumers to examine their understanding of *Dietary Guidelines* concepts and concepts supporting *MyPlate*, as well as barriers to using them. Some of the information collected will attempt to answer questions about how Americans use health information to help them make food choices—for example, how individuals perceive and understand dietary guidance messages, and how they use these messages to make decisions about choices in the food environment. Information is also needed for different audiences, based on various income levels, marital status, education level, race/ethnicity, family, life stage, gender, age, and desires for weight loss to determine if particular messages are more readily understood and useful, and the context for such, so that guidance can be tailored to meet various population's needs.

CNPP believes that obtaining information that is formative from consumers is fundamentally necessary for updating *Dietary Guidelines* implementation and communications approaches. Formative research is particularly useful for gaining insights and a better understanding of the target audience. Without this data from consumers, CNPP would not be able to incorporate useful messages and materials for the intended audience in any proposed updates to these guidance pieces. Formative research consists of qualitative techniques, such as open-ended structured discussions or interviews with individuals or small groups of individuals, and most often includes ethnographic studies, in depth interviews, Wed-based collections, as well as focus groups.

As part of its commitment to advancing dietary guidance in a way that motivates behavior change, CNPP plans to continue its implementation of nutrition education based on the *Dietary Guidelines* through resources and tools to continue to support various audiences through

www.MyPlate.gov. The key is for all messages to be simple, clear and actionable, in order to help improve the health of all Americans.

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

This revised formative input and feedback information collected will assist CNPP in its efforts to develop practical and meaningful nutrition guidance and communication efforts for Americans to help improve their health. The primary users of the research results will be FNS programs (including CNPP), State agencies, and other Federal agencies tasked with developing and using practical and meaningful nutrition education resources for empowering American consumers.

The primary goal of information collection (through consumer focus groups, qualitative interviews, ethnographic studies, Web-based surveys, etc.) will be to expand the knowledge base about how *Dietary Guidelines*-grounded consumer messages supporting MyPlate are understood and how they can be used by consumers when making food choices. Focus groups have been used in the *Dietary Guidelines* revision process since 1995. Focus groups and usability testing were used in the development of *Dietary Guidelines* implementation tools including the original 1992 Food Guide Pyramid, and the 2005 MyPyramid educational messages and materials. When the Food Guide icon was updated to MyPlate, focus groups and surveys were conducted in designing and developing the MyPlate icon and related resources at www.MyPlate.gov. More recently, to gather deeper insights into daily eating decisions and behaviors, CNPP utilized an anthropological approach called journaling, which asked participants to record certain aspects of

their daily experiences over the course of days or weeks. During the allotted timeframe, participants were probed or questioned by the researcher to gather real time feedback about their decision-making and its relation to the participant's knowledge and attitudes. Afterwards, CNPP held small in-depth follow-up discussions with a subset of participants completing the journaling exercise to better understand their responses. Findings were used to inform MyPlate's App called *Start Simple with MyPlate* that helps users set daily, healthy eating goals based on MyPlate's five food groups and is available on iPhones and Androids. Additionally, recent focus groups provided insights into the development of MyPlate on Alexa, USDA's first skill available on all Alexa devices that provides healthy eating tips straight to your home. Moreover, the findings from focus groups were also used to inform updates to the MyPlate Quiz that provides users with personalized nutrition information based on their quiz answers.

More information is needed about changing behavior related to nutrition, including a better understanding of target audience perceptions and potential motivators and barriers for changing dietary habits, and tools/mechanisms people gravitate toward to assist them in daily decision-making about health. Interactive, digital tools can assist the public in making healthier diet and choices. Users may voluntarily go to the website and/or mobile app store and submit information (for example, profile information, email address) to assist them in creating an account; they can enter as much or as little as desired. Users may also choose how often to use the tool (e.g., one time only, daily, weekly, etc.) and will have access to their data when logged into their account. The information obtained is stored in a user account maintained by USDA information technology (IT) staff. Only persons responsible for system maintenance, such as USDA information technology, contract, or CNPP staff, have access to stored user information and usage metrics. CNPP does not have access to personally identifiable user information;

backend data would only be used to identify overall trends in usage in order to make system improvements. CNPP may also review de-identified, aggregated data to identify trends that can inform system improvements to best support users in achieving their health and wellness goals by understanding how using specific site features may be associated with reaching goals.

More information is also needed about responses to consumer message concepts and nutrition education materials including the use of technology for accessing this information. All of this will be helpful in presenting messages that are targeted to various audiences.

The approval of this information collection is necessary for USDA to develop a communications and audience outreach strategy that consumers not only find relevant but are also designed to accurately reflect the everyday decisions today's consumers face when making choices about nutrition and health.

The agency plans to submit supplemental information collection request package which will include but not limited to memo with burden activities, burden estimates, incentives, contractor's confidentiality agreement (Appendix 5 Sample Confidentiality Agreement), advance or post communication tools, surveys, screener or discussion guides (Appendix 6 Sample Participant Screener), consent forms, institutional review board certification, recruitment plans, survey instruments translated in English and Spanish etc.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

CNPP is committed to complying with the E-Government Act of 2002, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes.

CNPP is aware and will submit any websites and/or screenshots associated with generic clearance 0584-0523 during ancillary information collection requests. Collecting information during website development or various materials development may be accomplished via computers. Focus group discussions and interviews may be video or audio taped and transcribed to maximize access to detail. Regarding interactive tools, data collection is 100 percent electronic. Users who choose to create accounts will have information that they have volunteered (email address and password) saved to their accounts electronically and can access it any time.

A4. Efforts to identify duplication.

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There may be similar data collections; however, those do not meet our needs. This information collection also builds on prior research efforts. CNPP may modify previous research efforts to ensure that previous results remain relevant to specific audiences. Focus groups were used in the *Dietary Guidelines* revision process – specifically, its translation into consumer nutrition education resources – for 1995, 2000, 2005, 2010, 2015, 2020-2025 and were or will also be used for 2025-2030. Focus groups and usability testing were used in the development of *Dietary Guidelines* implementation tools including the original 1992 Food Guide Pyramid, and the 2005 MyPyramid educational messages and materials. In 2010, focus groups and surveys were conducted in designing and developing the MyPlate icon and related resources at www.ChooseMyPlate.gov (now renamed to www.MyPlate.gov). Information that continues to

be collected may include previous messages and products that help general consumers make healthier food choices, provide additions and enhancements to www.MyPlate.gov, and help develop resources for special population groups including, but not limited to, pregnant and lactating people, infants and toddlers as well as older Americans. The possibility for developing new messages, materials, and tools also exists with revised or new recommendations in future *Dietary Guidelines*.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

There will be no impact on small businesses or other small entities. No small businesses will be involved in this information collection request.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is an ongoing, voluntary data collection. The National Nutrition Monitoring and Related Research Act of 1990 requires the publication of a report entitled *Dietary Guidelines for Americans* that shall contain dietary information and guidance for the general public and that shall be promoted by each Federal agency in carrying out any Federal food, nutrition, or health programs. The Agricultural Act of 2014 mandated the addition of dietary guidance for women who are pregnant and infants and toddlers from birth to 24 months of age beginning with the 2020 edition. The MyPlate icon and associated tools are central to nutrition education efforts nationwide designed to empower Americans in making healthy food choices that are consistent

with the *Dietary Guidelines*. Digital tools will be developed based on up-to-date nutrition guidance. If the information is not collected, users will not be able to access their individual accounts. Users will voluntarily enter information into the system. Therefore, the frequency of the data collection is determined by the user. Collection of data is a critical element of assessing effective methods of translating the *Dietary Guidelines* to ensure that its recommendations and messages continue to be scientifically sound, understood, and actionable by the public. CNPP would not be able to carry out this critical element of its mission if these data were not collected.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that would cause an 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 three 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 which 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.**

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

The Department of Agriculture - Center for Nutrition Policy and Promotion; Agency Information Collection Activities; Proposed Collection, Comment Request: Generic Clearance for the Development of Nutrition Education Messages and Products for the General Public 60-day Federal Register Notice was published on May 6, 2022 on pages 27089-27090 of the Federal Register, Vol. 87, No. 88. No comments were received.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Center for Nutrition Policy and Promotion (CNPP) has ongoing communications with MyPlate National Strategic Partner Organizations and various other stakeholders regarding future MyPlate communications efforts and consumer communications research related to nutrition and health. CNPP holds quarterly meetings with the MyPlate National Strategic Partners with about 50 or more in attendance. During these meetings we receive feedback on MyPlate's work. The last meeting was September, 20, 2022. As part of our continued/ongoing research we are engaging them on data needs. Our partners are listed publicly here: National Strategic Partners | MyPlate

Participants for future focus groups, interviews, Web-based surveys and other testing instruments will not be pre-selected, and for this reason there will be no opportunity to consult with them prior to conducting formative research.

A9. Explain any decisions to provide any payment or gift to respondents.

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Focus group and selected in-person interview participants may receive a gift card incentive intended to offset any expenses such as transportation, telephone minutes and childcare costs. Amounts and justifications will be determined on an individual project basis associated with this generic clearance request. This information will be included in the information collection request (ICR) memo provided to OMB for each supplemental information collection request submitted under this generic clearance.

A10. Assurances of confidentiality provided to respondents.

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

CNPP and contractors will follow procedures for maintaining safeguards consistent with the Privacy Act during all stages of data collection. A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on March 31, 2000, Volume 65, Number 63 (Appendix 7), and is located on pages 17251-17252 discusses the terms of protections that will be provided to respondents. Exact procedures will be explained in each supplemental information collection request. This information will be included in the memo provided to OMB for each formative input session to be conducted. Respondents will receive information about privacy and safeguards in an advance letter or during the telephone screening process and again before the information collection sessions begin. Respondents will be informed that all information will be kept private and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law. The release form for the focus groups will cite

the Privacy Act.

Respondents in focus group sessions will not know each other and will be asked to introduce themselves by first name only. The focus group sessions will be in a room with a closed door so passers-by cannot eavesdrop on the discussion. Focus group sessions will be timed to allow more than enough time between sessions to avoid respondents in different groups seeing each other. Individual interviews will be conducted in a private setting.

At the beginning of focus group sessions, individual interview sessions and prototype testing sessions, the facilitator will explain that the respondents' names and addresses will never be disclosed or associated with the formative input session results.

This information collection request has been reviewed and cleared by FNS Privacy Officer, Michael Bjorkman, on September 7, 2022

A11. Justification for any questions of a sensitive nature.

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Information collection will not involve questions of a sensitive nature.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

Testing	Estimated	Number of	Estimated total	Estimated time	Estimated total

instrument	number of individual respondents	responses per respondent	annual responses per respondent	per response in hours	annual burden in hours
Focus Group Screeners	7,500	1	7,500	.25	1,875
Interview Screeners	7,500	1	7,500	.25	1,875
Focus Groups	500	1	500	2	1,000
Journaling	500	1	500	.25	125
Interviews	500	1	500	1	500
Consumer Panels	200	3	600	.50	300
Web-based Collections	20,000	1	20,000	.25	5,000
Consent Form	21,000	1	21,000	.08	1,680
Total	57,700		58,100	0.21265	12,355

The total estimated annual burden is 57,700 total annual respondents 12,355 hours and 58,100 responses. The agency multiples the annual total estimates to derive at the estimated three-year total estimates required for generic request; thus, we are requesting 173,100 total respondents for three years, 37,065 three-year burden estimates and 174,300 total responses for three-year approval period. Current estimates are based on both historical numbers of respondents from past projects as well as estimates for projects to be conducted in the next three years.

B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

The estimated total annual cost to respondent with fully loaded wages is $525,007.20 ($394,742.25 + $130,264.95 fringe benefits) we used 0.33 percent to account for fully loaded wages.

Testing Instrument	Total Burden Hrs	Hourly Rate ($)	Total Cost ($)

Focus Group Screeners	1,875	$31.95	$59,906.25
Interview Screeners	1,875	$31.95	$59,906.25
Focus Groups	1,000	$31.95	$31,950
Journaling	125	$31.95	$3,993.75
Interviews	500	$31.95	$15,975
Consumer Panels	300	$31.95	$9,585
Web-based Collections	5,000	$31.95	$159,750
Consent Form	1,680	$31.95	$53,676
Total	**12,355**	$31.95	**$394,742.25**

*$31.95 hourly rate is derived from the U.S. Department of Labor, Bureau of Labor Statistics published in 2022. See http://www.bls.gov/news.release/pdf/empsit.pdf

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The combined estimated total annualized cost to the Federal government is $**6,762.86 with fully loaded wages included.** The information collection assumes that a federal project officer will work a total of 80 hours per year for a GS-12, Step 6 in the Washington-DC locality, at $50.22 per hour for a total of $4,017.60 (plus $1,325.81 which is 33% of this cost = **$5,343.41** (for fully loaded wages). Additionally, this information collection estimates a total of 10 hours staff time for CNPP's Division Director of Nutrition Education and Innovation Division to

review and edit this collection per year: for a GS-15, Step 1 in the Washington-DC locality, at $71.15 per hour for a total of $711.50 (plus $234.80 which is 33% of this cost = **$946.30** (for fully loaded wages).

Lastly, this information collection estimates a total of 5 hours staff time for CNPP's Division Director of Nutrition Guidance and Analysis Division to review this collection per year: for a GS-15, Step 1 in the Washington-DC locality, at $71.15 per hour for a total of $355.75 (plus $117.40 which is 33% of this cost = **$473.15** (for fully loaded wages). All Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) effective January 2022 (https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf).

The Agency incurs costs in setting up testing environments to include such things as hiring contractors, facilitators, or moderators, renting meeting space, in providing cash incentives which can be used to offset travel or parking expenses incurred by the respondents, etc. Costs will be determined on an individual project basis and will be included in the supplemental generic request memo provided to OMB for approval before each formative input session to be conducted.

A15. Explanation of program changes or adjustments.

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is an extension of a currently approved information collection; the burden hours remain the same.

A16. Plans for tabulation, and publication and project time schedule.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

No complex analytical techniques will be used for the results of the collection of information. Findings from all data collection will be included in individual summary reports submitted to CNPP. The reports will describe the focus group and interview testing methods, findings, conclusions, implications, and recommendations for use in the assessment and potential revision of the consumer resources that translate and help implement the *Dietary Guidelines* and that support MyPlate. Analysis will be qualitative in nature, although information about results may include documentation of methodology and response rates. There will be no specific quantitative analysis of data. Regarding interactive tools, CNPP and/or those working for CNPP may publish observations identifying relationships between usage trends and achieving health and wellness goals (e.g., using specific site features may be associated with reaching goals) using de-identified data. After data collection has been completed, it is anticipated that the findings may be published in appropriate journals and shared at nutrition meetings and conferences to disseminate information to those who share similar goals of gathering insights about how consumers understand and use nutrition information and how it may impact their behavior. The information collected will not be nationally representative or statistically valid.

A17. Displaying the OMB Approval Expiration Date.

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.