Attachment 1

Request for Approval Under the "Fast Track Generic Clearance for the Collection of Routine Customer Feedback" (OMB Control Number: 3041-0136)

TITLE OF INFORMATION COLLECTION:

CPSC Refining Sleep Messaging for Seated/Non-Sleep Products Focus Group Study

PURPOSE:

On behalf of the U.S. Consumer Product Safety Commission (CPSC), Fors Marsh Group (FMG) is conducting three focus groups with primary caregivers of infants ages 0 to 6 months ("young infants") or with caregivers who currently have children ages 6 to 12 months, who were primary caregivers when their children were under 6 months. We will ensure that participants include diverse populations, such as BIPOC (Black, Indigenous, Person of Color) and caregivers ofvaried socioeconomic backgrounds. The primary objectives of this study are to understand better caregivers' decision-making processes for purchasing or allowing their children to sleep in a seated infant product and obtain their reactions to the current warning labels on these items. We are also interested in understanding caregivers' suggestions for improving the statement regarding sleep hazards within the warning label to make the statement more useful for caregivers. The data from this study will assist CPSC in recommending more effective warning labels for non-sleep products used by caregivers for their infants.

Given that caregivers are often inundated with safety messaging that is constantly changing, it is important to provide clear recommendations for safe infant sleep. The long-term goal of this research is for CPSC to be able to make clear recommendations for updating language in product safety hazard labels to educate caregivers about the risks facing a young infant when sleeping in a seated/non-sleep product and to prompt caregivers to move the child to a firm, safe sleeping space as soon as possible.

BACKGROUND:

CPSC is charged with protecting the public against dangers associated with consumer products. The 2020 Nursery Product Annual Report[1] reported 357 deaths related to nursery products between 2015 and 2017, with 19 percent of those deaths related to cradles/bassinets, 9 percent related to infant carriers, 3 percent related to portable baby swings, and 2 percent related to bouncers. In 2019, the media and public turned their attention to the dangers of inclined sleep products when CPSC worked with Fisher-Price to recall its Rock 'n Play Sleeper. In 2021, CPSC approved a federal rule requiring products marketed or intended for infant sleep to have an inclined back of 10 degrees or lower.[2] Factors that influence the effectiveness of the sleep hazard statements on the warning labels of non-sleep products include warning language and appearance.

[1] Consumer Product Safety Commission (2020). Injuries and deaths associate with nursery products among children younger than age five. Nursery Products Annual Report. https://www.cpsc.gov/s3fs-public/Nursery-Products-Annual-Report-2020.pdf?ZUtixTY7nM_4JlIhBQFreVGj1LU1YfjD

[2] https://www.federalregister.gov/documents/2021/06/23/2021-12723/safety-standard-for-infant-sleep-products

Through focus groups, CPSC seeks to understand better: (1) consumers' current perceptions of the safety of infants sleeping in non-sleep designated products; (2) what safety and risk information consumers look for in the sleep hazard statement within the warning label for non-sleep products; and (3) how to translate that information in an effective manner to provide recommendations on how to improve communication of sleep hazard safety information for infant seated products. Ultimately, CPSC is interested in understanding the language, content, and appearance of sleep safety guidelines within the warning labels to help educate consumers about how to make informed decisions when purchasing and using an infant seated product safely.

DESCRIPTION OF RESPONDENTS:

For the *CPSC Refining Sleep Messaging for Seated/Non-Sleep Products Focus Group Study,* all recruited participants will be primary caregivers of young infants and are at least 18 years old. Participants will currently care for young infants ages 0 to 6 months or currently care for infants ages 6 to 12 months but who also cared for the infants when they were younger. Participants will provide care for the infants no less than 3 days a week, during sleep and awake times, and who make purchasing decisions for the infants. Participants will be recruited to ensure diverse educational attainment, income, age, race/ethnicity, and gender. Participants will participate in focus groups:

- Twenty-four caregivers will participate in three 90-minute focus groups.

TYPE OF COLLECTION: (Check one)

[ ] Customer Comment Card/Complaint Form	[ ] Customer Satisfaction Survey
[ ] Usability Testing (*e.g.*, website or software)	[] Small Discussion Group
[X] Focus Group	[] Other:_____

CERTIFICATION:

I certify the following to be true:

1. The collection is voluntary.
2. The collection is low burden for respondents and low-cost for the federal government.
3. The collection is non-controversial and does not raise issues of concern to other federal agencies.
4. The results are not intended to be disseminated to the public.
5. Information gathered will not be used to substantially inform influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or who may have experience with the program in the future.

Name: Rachel Ingersoll

To assist review, please provide answers to the following question:

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? [ ] Yes [X] No
2. If Yes, will any information that is collected be included in records that are subject to the Privacy Act of 1974? [ ] Yes [] No
3. If Yes, has an up-to-date System of Records Notice (SORN) been published? [ ] Yes [ ] No

Gifts or Payments:

Is an incentive (*e.g.*, money or reimbursement of expenses, token of appreciation) provided to participants? [X] Yes [] No ($90 per participant for a 90-minute interview).

We are proposing a $90 incentive, not only to encourage participation, but also to offset the cost burden that participation places on respondents. These participants have competing demands for their time, including incurring other sources of income and costs associated with participation, such as travel costs for getting to the facility and the cost of childcare while respondents are participating. Incentives must be high enough to equalize the burden placed on respondents for their time and the cost of participating (Russel et al., 2000) to ensure that respondents are not incurring a net loss from the study. Additionally, keeping incentives as close to market rate as possible helps ensure that we can recruit respondents from a variety of backgrounds and financial situations. This also decreases the effort required of recruiters to generate leads, and it also results in higher show-rates among recruited participants, easing the overall recruitment process and costs.

BURDEN HOURS

Focus Groups

Category of Respondent	No. of Respondents	Participation Time	Burden
Screened participants who did not qualify	100 (3 times the final participant sample)	5 minutes per participant	8 hours and 20 minutes
Screened participants who qualified and showed up to the study but did not participate.	12	10 minutes per participant	2 hours and 0 minutes
Screened participants who qualified and participated in the study.	24	95 minutes per participant	38 hours and 0 minutes

FEDERAL COST: The estimated annual cost to the federal government is $3,240.

The total estimated cost to the government for conducting the data collection is as follows:

Number of Participants	36
Incentive Rate	$90
Total estimated cost of conducting the focus groups	$3,240

If you are conducting a focus group, survey, or plan to employ statistical methods, please provide answers to the following questions:

The selection of your targeted respondents

1. Do you have a customer list or something similar that defines the universe of potential respondents, and do you have a sampling plan for selecting from this universe? [X]Yes [ ] No

If the answer is yes, please describe both below (or attach the sampling plan). If the answer is no, please describe how you plan to identify your potential group of respondents and how you will select them.

For the *CPSC Message Frame Testing Focus Groups*, the focus group facilities will recruit parents and grandparents to participate in the groups from their database via a phone screener. Market research facilities will have at least 1 month to recruit 12 participants to seat eight participants per focus group. All participants who are recruited for these caregiver focus groups will be parents, grandparents, or others who are at least 18 years old. Participants must currently care for young infants ages 0 to 6 months or currently care for infants ages 6 to 12 months but also cared for the infants when they were younger. Participants should provide care for the infants no less than 3 days a week, during sleep and wake times, and they must make purchasing decisions for the infants. Participants will vary according to level of educational attainment, level of income, and they must meet soft quotas for other demographic variables of interest (*i.e.*, age, race/ethnicity, and gender) to guide recruitment of participants and to ensure a diverse sample. Participants will also be screened to ensure that they do not work in a field related to health, communication, infant care, product manufacturing, or product safety and that they have not participated in a study within the past 3 months.

Throughout the recruitment process, FMG will evaluate the list of scheduled participants daily to adjust for any demographic over- or under-sampling. Given the qualitative nature of this study, soft quotas are not meant to be nationally representative.

The current intent is to collect data in person, but the study team will be monitoring the COVID-19 situation and will decide after Office of Management and Budget (OMB) and institutional review board (IRB) determine whether the focus groups need to be moved to a virtual environment to avoid putting the health of any participants or moderators at risk from COVID-19.

Administration of the Instrument

1. How will you collect the information? (Check all that apply.)

[ ] Web-based or other forms of social media

[ ] Telephone

[X] In-person

[ ] Mail

[ ] Other, Explain

2. Will interviewers or facilitators be used? [X] Yes [ ] No

COVID-19 Procedures:

FMG has a safety protocol in place that aims to protect the safety of its employees, participants, and their families. The FMG protocol follows CDC guidance around COVID-19, as well as appropriate state-level guidance (*i.e.*, Virginia).

If FMG and CPSC agree that it is safe to conduct focus groups in person, FMG will institute health precautions based on current CDC recommendations during fielding. Safety strategies may include asking participants to use hand sanitizer before and after interacting with products, wearing masks, using latex gloves, and socially distancing the products throughout the room. If FMG and CPSC do not think it is safe to conduct the focus groups in person, some or all focus groups will be conducted virtually for the safety of staff and participants.

Please make sure that all instruments, instructions, and scripts are submitted with the request.