

Request for Approval under the “FNS Fast Track Clearance for the Collection of Routine Customer Feedback” (OMB Control Number: 0584-0611)

TITLE OF INFORMATION COLLECTION: USDA CNPP MyPlate Focus Groups

PURPOSE:

The U.S. Department of Agriculture’s (USDA) Food and Nutrition Service’s (FNS) mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthy diet and nutrition education in a manner that supports American agriculture and inspires public confidence. Furthermore, the Center for Nutrition Policy and Promotion’s (CNPP) mission is to improve the health of Americans by developing and promoting dietary guidance that links scientific research to the nutrition needs of consumers. FNS and CNPP are continuing their efforts to disseminate important nutrition information and educate the American public about nutrition through MyPlate.gov, whose logo and website serve as guides to nutrition recommendations based on the *Dietary Guidelines for Americans*. This year, they are initiating a consumer communications MyPlate campaign to increase Americans’ awareness and familiarity of MyPlate.gov and to encourage increased adoption of MyPlate.gov’s nutrition recommendations. This effort also includes a direct focus on Black Americans, Hispanic/Latino Americans (both English-speaking and Spanish-preferring), and low-income Americans.

In order to meet these important objectives, FNS and CNPP must understand the current nutrition mindsets and needs of these audiences, especially as they relate to the decisions they make regarding healthy eating. Historically, FNS and CNPP have conducted consumer research to inform strategy, creative development, and outreach when communicating to its primary target audiences. Such research has included message and creative testing to inform the release of each iteration of the *Dietary Guidelines for Americans*, as well as studies to inform the development of online tools such as MyPlate’s Interactive Online Quiz (created in the Fall of 2020).¹

Both FNS and CNPP understand the importance of consumer research to inform creative development, but it is even more important to these entities that research only be conducted when it informs new areas of inquiry. To ensure this research effort augments what is known and focuses squarely on its unique research objectives, FNS and CNPP have taken several steps to review previously-conducted studies on similar topics. This review included reassessing the aforementioned audience research, as well as examining existing academic research examining MyPlate, conducted from 2018-2023. This exploration revealed limited data on familiarity with and perceptions of MyPlate, especially among underserved audiences (e.g., Black Americans, Hispanic/Latino Americans, and low-income Americans). Additionally, FNS and CNPP conducted an analysis of the current nutritional communications landscape by studying communications efforts among a set of peer organizations, brands, and campaigns.

To better comprehend what creative and messaging directions would be most effective in educating the American public through MyPlate – after the height of the COVID-19 pandemic and given the current economic environment – FNS intends to conduct a robust series of focus groups. Specifically, this qualitative research task includes 18 virtual focus groups among a diverse array of key audiences. All discussions will be 90 minutes in length.² These sessions will enable a comparative analysis of these groups, across and within key audience segments. In

¹ The reports submitted for these research events can be submitted upon request.

² The 90 minutes does not include time for set-up and login, as explained later in this cover memo.

addition, these focus groups will serve as the primary data collection method to inform the launch of the updated campaign branding approach and its corresponding messaging and creative development for MyPlate.

DESCRIPTION OF RESPONDENTS:

In total, we intend to conduct 18 focus groups. To ensure robust feedback across key demographics, we will conduct a nationwide recruit, with 3 focus groups among Black/African American respondents, 3 English-language focus groups among Hispanic/Latino respondents, 3 Spanish-language focus groups among Hispanic/Latino respondents, and 3 focus groups among White respondents. These focus groups will be recruited among a mix of overweight/obese respondents and “healthy weight” respondents (as calculated by self-reported heights and weights to measure BMI)³; as well as by a mix of low-income and middle-to-high income respondents. The Spanish-language focus groups will ensure that MyPlate branding, messaging, and creative materials resonate among Spanish-speaking, as well as English-speaking, audiences.

To further inform our understanding of lower-income audiences, we will conduct 6 focus groups, across a mix of race/ethnicity, among respondents who are participants in or eligible for the USDA’s Supplemental Nutrition Assistance Program (SNAP); these focus groups will be stratified by parents who have children under 18 years of age in their household, empty nesters/older adults, and 18-25-year-old respondents. Table 1, below, illustrates the focus group distribution.

Respondents will be recruited to ensure a mix of geography and locality (i.e., urban, suburban, small town/rural), familiarity with government programs (e.g., MyPlate and SNAP), and relevant psychographics (e.g., concerns about nutrition). Individuals will be recruited via our professional recruitment partners and all respondents will receive incentives for their time.

Table 1. Focus Group Distribution

18 Focus Groups Total				
	Black Adults	Hispanic Adults (Conducted in English)	Hispanic Adults (Conducted in Spanish)	White Adults
Low Income	<ul style="list-style-type: none"> • 1 group among Overweight/Obese • 1 group among Healthy Weight 	<ul style="list-style-type: none"> • 1 group among Overweight/Obese • 1 group among Healthy Weight 	<ul style="list-style-type: none"> • 1 group among Overweight/Obese • 1 group among Healthy Weight 	<ul style="list-style-type: none"> • 1 group among Overweight/Obese • 1 group among Healthy Weight
Middle-to-High Income	<ul style="list-style-type: none"> • 1 group among a mix of BMI 	<ul style="list-style-type: none"> • 1 group among a mix of BMI 	<ul style="list-style-type: none"> • 1 group among a mix of BMI 	<ul style="list-style-type: none"> • 1 group among a mix of BMI
Parents with	<ul style="list-style-type: none"> • 2 groups among mixed race/ethnicity: both groups among SNAP 			

³ No morbidly obese respondents will be included in this research, per USDA guidance.

Children <18 in Household	participants/SNAP-eligible/low-income
Empty Nesters/Older Adults	<ul style="list-style-type: none"> 2 groups among mixed race/ethnicity: both groups among SNAP participants/SNAP-eligible/low-income
18-25 Years Old	<ul style="list-style-type: none"> 2 groups among mixed race/ethnicity: both groups among SNAP participants/SNAP-eligible/low-income

Recruitment

Individuals will be identified for potential participation utilizing a screener document (Attachments A-1, A-2, A-3, and A-4) to identify the demographics and other key criteria of the potential participants. Professional recruiters will be used to identify potential participants using a database and will then follow up with the screener online and a short recruitment phone call. The use of the database does not impose additional burden on the respondents.

Confirmation

After completing the screener, participants who qualify will be sent a focus group confirmation form (Attachments B-1 and B-2) that outlines the purpose of the research, the fact that it is voluntary research, Privacy Act information, a public burden statement, the date and time of the virtual focus group, incentive information, and log-in instructions.

TYPE OF COLLECTION: (Check one)

- | | |
|--|---|
| <input type="checkbox"/> Customer Comment Card/Complaint Form | <input type="checkbox"/> Customer Satisfaction Survey |
| <input type="checkbox"/> Usability Testing (e.g., Website or Software) | <input type="checkbox"/> Small Discussion Group |
| <input checked="" type="checkbox"/> Focus Group | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Quick census or surveys | |

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 for the purpose of substantially informing influential policy decisions.
6. The collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the future.

Name: Jessica Larson, MS, RD

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

Personally Identifiable Information:

1. Is personally identifiable information (PII) collected? Yes 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

Sensitive Information:

1. Will sensitive information, such as demographic characteristics, be collected from respondents?
 Yes No

2. If yes, explain the necessity of such information to the programmatic objective(s)?

Individuals will be identified for potential participation utilizing a screener document (Attachments A-1, A-2, A-3, and A-4) to identify the demographics of the potential participants. Demographic information allows the research to ensure that it is reflective of the wide range of key audiences. That being said, the demographic information is not calculated nor held as a quota for participation.

In addition, PII (respondents' contact information) will only be obtained by the recruiters in order to schedule the focus group discussions and contact participants to conduct technology checks and remind them of the research session. This information will not be shared with the government nor the research team conducting the data collection and analysis. Finally, all respondent information will be anonymous and confidential, and no PII will be recorded or included in reporting.

Gifts or Payments:

Is an incentive (e.g., money or reimbursement of expenses, token of appreciation) provided to participants? Yes No

FNS will provide an incentive of a \$75 gift card for participating in the focus groups. This is the incentive level we have utilized for previous OMB-approved qualitative research for FNS and CNPP efforts. Incentives have been considered a standard practice in conducting qualitative research (see, for instance, the CDC General Guidelines for Focus Groups), helping to maximize participation, manage recruitment hours, and reduce no-show rates. For 2-hour focus groups (including 30 minutes for logging into the virtual, online platform), the incentive can be used to offset any child-care cost for harder-to-reach groups, even for groups that are conducted virtually. In these sessions, recruiters ask potential participants to ensure they can participate in the discussions uninterrupted. Additionally, as participants will use either smartphones, tablets, or laptops to log in and participate in the focus groups, the incentive can be used to offset any expenses incurred by using these devices. Finally, incentives are more likely to secure the participation of individuals meeting the screening requirements, especially given the more complex nature of this recruit.

More specifically, 14 of the 18 focus groups will include low-income participants. In our experience, virtual focus groups among low-income participants have higher no-show rates than

no-show rates with sessions among middle- or higher-income individuals. Furthermore, the show rates among low-income participants may also be affected by available opportunities to earn additional income (e.g., extra hours at work or side jobs) that pay more than the incentive, which is below the typical market rate.

As such, utilizing this incentive rate will make recruitment more effective and thus save government money in overall research recruitment costs.

Finally, it is important to address equity as well. As noted in the January 20, 2006, Memorandum for the President’s Management Council, if incentives are used, these should apply to all participants in research. Therefore, the recommended incentives must be applied to all participant segments, regardless of the incidence. As a result, all participants will receive the same incentive rate.

BURDEN HOURS

Category of Respondent	No. of Respondents	Participation Time	Burden Hours
Screener (Attachments A-1, A-2, A-3, A-4)			
Individuals (respondents)	144	.25 hrs	36.0 hrs
Individuals (non-respondents)	432	.25 hrs	108.0 hrs
Focus Groups			
Individuals (confirmations – Attachments B-1, B-2)	144	.05 hrs	7.2 hrs
Individuals (consent – Attachments C-1, C-2)	144	.05 hrs	7.2 hrs
Individuals (respondents – Attachments D-1, D-2)	108	2.0 hrs*	216.0 hrs
Individuals (non-respondents)	36	.167 hrs	6.0 hrs
Totals	576		380.4 hrs

*NOTE: The data collection will take 90 minutes, but respondents will need an additional 30 minutes for the technology check and to ensure they can log into the online interface correctly.

A total of 576 individuals will be contacted in order to conduct research among 108 individuals. The 432 screener non-respondents are participants who choose not to complete the full screener or who do not qualify for the focus groups. The remaining 144 individuals will be confirmed for (i.e., meet recruitment criteria) and complete consent forms for the focus groups. Of the 144 individuals confirmed for the focus groups, we will seat 6 per group for a total of 108 focus group respondents.

The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2021 National Occupational and Wage Statistics, All Occupations (00-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage for functions performed by respondents is estimated at \$22.00 per hour. With a burden of 380.4 hours at \$22.00 per hour, the base annual respondent cost is estimated at \$8,368.80. An additional 33% of the estimated base annual respondent cost must be added to

represent fully loaded wages, equaling \$2,761.70. Thus the total annual respondent cost is \$11,130.50.

FEDERAL COST:

It is estimated that Federal employees will spend approximately 60 hours overseeing this collection in 2023 with an average of a GS-14, step 1 wage. Using the hourly wage rate of \$63.43 for a GS-14, step 1, Federal employee from the 2023 Washington, DC, locality pay table, and including an additional 33% of the estimated base cost, the estimated costs equal \$5,061.714.

Contractor costs to the Federal Government will total \$160,642.00 over the course of this collection based on fully loaded rates. When combining the Federal employee and contractor costs, the total annual cost to the Federal Government for this information collection is estimated at **\$165,703.71**.

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?
 Yes No
2. If the answer is yes, please provide a description of both below (or attach the sampling plan)? If the answer is no, please provide a description of how you plan to identify your potential group of respondents and how you will select them?

We will be working with professional recruiting partners who have proprietary “opt-in” databases of potential research participants. These databases contain general demographic information for each individual in their database. Only individuals whose demographic profiles fall within the project’s general parameters will receive an online screener and a short recruitment phone call to determine if they meet all project criteria. All individuals must meet the criteria listed in the screening questionnaire (Attachments A-1, A-2, A-3, and A-4) and provide consent (Attachments C-1 and C-2) to participate before any research can take place.

Administration of the Instrument

1. How will you collect the information? (Check all that apply)
 Web-based or other forms of Social Media
 Telephone
 In-person
 Mail
 Other, Explain
2. Will interviewers or facilitators be used? Yes No

Trained moderators will facilitate the online discussions as described in the focus group Discussion Guide (Attachments D-1 and D-2). Discussions will include exploration of participant reactions to various creative materials (Attachments E-1, E-2, E-3, E-4, and E-5).

Attachments:

A-1 Screener by Ethnicity (English)
A-2 Screener: Spanish-Preferring (English)
A-3 Screener: Spanish-Preferring (Spanish)
A-4 Screener by Life Stage (English)
B-1 Confirmation Form (English)
B-2 Confirmation Form (Spanish)
C-1 Consent Form (English)
C-2 Consent Form (Spanish)
D-1 Discussion Guide (English)
D-2 Discussion Guide (Spanish)
E-1 Ad E (Why I'm Eating Better) (English & Spanish)
E-2 Ad T (Honoring Family Traditions) (English & Spanish)
E-3 Ad C (Honoring Your Commitments) (English & Spanish)
E-4 Ad M (Budget Friendly) (English & Spanish)
E-5 Fact Sheet (English & Spanish)
Memo to OCIO – CNPP Consumer Research