

## Memorandum

**Date:** November 3, 2023

**To:** Laurel Havas, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget (OMB)

**Through:** Dionne Duncan-Hughes, FNS Information Collection Clearance Officer  
Planning and Regulatory Affairs  
Food and Nutrition Service (FNS)

Ruth Brown, Department Clearance Officer  
U.S. Department of Agriculture  
Office of the Chief Information Officer (OCIO)

**From:** Jackie Haven, Deputy Administrator  
Center for Nutrition Policy and Promotion (CNPP)  
Food and Nutrition Service (FNS)

**Re:** Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval  
for Collection for Formative Quantitative Research for USDA MyPlate National  
Outreach Campaign

The Center of Nutrition Policy and Promotion (CNPP) of the United States Department of Agriculture (USDA) is requesting approval for formative research under approved Generic OMB Clearance No. 0584-0524 Generic Clearance to Conduct Formative Research.

The Center of Nutrition Policy and Promotion is currently developing a National Outreach Campaign to increase awareness of MyPlate and engagement with MyPlate through its website, MyPlate.gov.

In order to meet these important objectives, CNPP would like to field a quantitative survey among American audiences, particularly targeting specific subgroups across key demographic variables such as race/ethnicity as well as adult participants of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) or the Supplemental Nutrition Assistance Program (SNAP) – referred to as “WIC/SNAP Participants”; and adults who are eligible for WIC or SNAP but do not currently participate in either program – referred to as “WIC/SNAP Eligibles.”

This request is to acquire clearance to collect voluntary feedback among these audiences to meet the following goals:

- To inform Campaign strategy and ultimately gauge efficacy, CNPP must collect baseline data on key MyPlate brand health metrics (e.g., brand recall, familiarity with the brand,

favorability towards the brand, and likelihood to engage with the brand) via a research tool that will enable analysis among target audiences and over time as the Campaign unfolds.<sup>1</sup>

- To determine how these audiences currently view MyPlate in comparison with other brands in its peer set, as well as understand which aspects of MyPlate best resonate among and across them.
- To understand audience mindsets regarding healthy behaviors and barriers to healthy eating.

Feedback collected will be used to develop Campaign outreach and strategy and provide an important baseline from which CNPP, in the future, can assess Campaign uptake among audience subgroups to inform the need for changes in dissemination strategies and tactics. It will also allow CNPP to gauge program impact post-implementation.

The following information is provided for your review:

1. **Title of the Project:** USDA CNPP Baseline Collection of MyPlate Brand Health
2. **Control Number:** 0584-0524; Expires 02/28/2026
3. **Public Affected by this Project:** Adult Americans, with particular emphasis on CNPP target audiences, as defined, below:
  - Black or African American adults
  - Hispanic or Latino adults
  - Asian or Pacific Islander adults
  - Adult participants of the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) or the Supplemental Nutrition Assistance Program (SNAP) – referred to as “WIC/SNAP participants”
  - Adults who are eligible for WIC or SNAP but do not currently participate in either program – referred to as “WIC/SNAP eligibles”

See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number of each audience type and key subgroup designations.

Under Department of Health and Human Services regulations found at 7 CFR 1c.104(d)(2), this research is exempt from IRB oversight. Given the determination, further IRB review and approval of this project is not required (Attachment D-1).

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<sup>1</sup> The research plan includes subsequent quantitative surveys after various points of the Campaign. All of these surveys will be submitted for OMB review and clearance.

#### 4. Number of Respondents

CNPP, via its contractors, will contact approximately 10,667 individuals and households to recruit:

- 2,560 participants completing the survey in English or Spanish.
  - 2,304 will take a web-based survey in English
  - 256 will take a web-based survey in Spanish

Among the 10,667 individuals initially contacted (see Attachments B-1, B-2, & B-3 for survey invitation), we estimate that 7,467 (70%) will not participate in any phase of research, whereas 3,200 (30%) will go on to participate in the screener. We further estimate that among 3,200 participants who would respond to a screener, 640 (20%) will not be eligible to complete the survey 2560 (80%) will be eligible to complete the survey. Since the consent form and the Privacy Act statement (Attachments A-1 & A-2) will be presented prior to the screener, the participants who would respond to the screener (3,200) would also submit a consent form and privacy statement.

**Table 4.1 - Number of Respondents**

Audience	# of Participants	# of Responders	% of Responders	# of non-responders	% of non-responders
<b>Invitation<sup>1</sup></b>					
English-Language Survey	9,600	2,880	30%	6,720	70%
Spanish-Language Survey	1,067	320	30%	747	70%
<b>Survey<sup>2</sup></b>					
English-Language Survey	2,880	2,304	80%	576	20%
Spanish-Language Survey	320	256	80%	64	20%
<b>Total</b>	<b>10,667</b>	<b>2,560</b>		<b>640</b>	
<sup>1</sup> CNPP assumes it will take 2 minutes for respondents to complete. <sup>2</sup> NOTE: The survey includes and assumes the following: <ul style="list-style-type: none"> <li>● It will take 2 minutes for respondents to review and provide consent (Attachments A-1 &amp; A-2).</li> <li>● It will take 2 minutes for respondents to review the Privacy Statement (Attachments A-1 &amp; A-2).</li> <li>● It will take 5 minutes for respondents to review and complete the screener (Attachments A-1 &amp; A-2).</li> <li>● It will take 15 minutes for respondents to complete the survey</li> </ul>					

(Attachments A-1, A-2, A-3, & A-4).

## 5. Time Needed Per Response

**Table 5.1 - Time Needed Per Response**

Collection Activity	Time (minutes)	Time (hours)
Invitation	2	0.033
Consent	2	0.033
Privacy Statement	2	0.033
Screener	5	0.083
Survey	15	0.250
<b>Total</b>	<b>26</b>	<b>0.432</b>

## 6. Total Burden Hours on Public

The total burden hours on the public are: 1,536.01 burden hours and 5,760 responses and 8,107 non-responses. The survey timing included in Table 6.1, below, includes the time to take the survey (15 minutes), as well as time for respondents to review and provide consent (2 minutes), review the Privacy Statement (2 minutes), and review and complete the screener (5 minutes).

**Table 6.1 Total Burden Hours on Public**

	Attachment	RESPONDENTS						NON-RESPONDERS				TOTAL BURDEN HOURS	
		# of Participants	# of Respondents	Frequency of Data Collection	Total Responses	Time per Response (hours)	Total Estimated Burden (hours)	# of Non-Responders	Frequency of Data Collection	Total Responses	Time per Response (hours)		Total Estimated Burden (hours)
Invitation													
-English-language respondents	B-1	9600	2880	1	2880	0.033	95.04	6720	1	6720	0.033	221.76	
-Spanish-language respondents	B-2/B-3	1067	320	1	320.1	0.033	10.56	747	1	746.9	0.033	24.65	
Survey													
-English-language respondents	A-1/A-3	2880	2304	1	2304	0.4	921.6	576	1	576	0.033	144.00	
-Spanish-language respondents	A-2/A-4	320	256	1	256	0.4	102.4	64	1	64	0.033	16.00	
<b>TOTALS</b>		<b>10,667</b>	<b>2560</b>		<b>5760</b>		<b>1129.60</b>	<b>640</b>		<b>8107</b>		<b>406.41</b>	<b>1536.01</b>

## 7. Project Purpose, Methodology, and Formative Research Design

### Background

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, CNPP's 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 campaign to increase Americans' awareness and familiarity of MyPlate and MyPlate.gov and to encourage increased adoption of MyPlate.gov's nutrition recommendations. This effort also includes a direct focus on traditionally underserved populations, including Black Americans, Hispanic/Latino Americans (both English-speaking and Spanish-preferring), and low-income Americans.

### Purpose

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).

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.

Most recently, to better comprehend what creative and messaging directions would be most effective in educating the American public through MyPlate, FNS conducted a robust series of focus groups among key audience segments, an effort approved by OMB.

This survey project builds on that qualitative research by measuring and analyzing key metrics including MyPlate’s brand health (and providing an important baseline), how well different statements describing and attributes of MyPlate resonate, and audience mindsets regarding healthy behaviors and barriers to healthy eating. In turn, the quantitative findings from this research will inform the launch of the updated Campaign branding approach for MyPlate. Through future surveys – each of which will be submitted separately to OMB for approval – this research will also allow for monitoring of changes in these metrics over time, to inform the need for adjustments in dissemination strategies and tactics in the National Outreach Campaign.

Methodology/Research Design

This research will consist of a 15-minute online survey that will be offered in both English and Spanish. The survey will include a nationwide base sample of 1,200 American adults over the age of majority (i.e., 18 or more years of age in most states; 19 or more years of age in Alabama and Nebraska), plus oversamples (i.e., additional completed surveys) to reach increased n-sizes among key segments. Doing so allows for analyzing the results among those audiences with greater statistical rigor. Table 7.1 summarizes the combination of the base sample and oversamples we recommend in order to reach these audiences. When combining the base sample and oversamples, the survey will have a final n-size of approximately 2,560 adults.

**Table 7.1 Recommended Oversamples<sup>2</sup>**

Black or African American adults	n=400
Hispanic adults (mix of acculturation and language preferences)	n=400
Asian or Pacific Islander adults	n=200
Native American adults	n=100
WIC/SNAP participants	n=400
WIC/SNAP eligibles	n=400

The survey primarily contains quantitative question types in a variety of formats but also includes a few open-ended (qualitative) items to provide additional context. Completion of the survey will be 100% voluntary/optional and will not include any personal information. The survey will be hosted on the online survey platform, IBM SPSS Data Collection Interviewer Server Administration.

Design/Sampling Procedures

Participants will be recruited randomly from an existing online panel. After participants consent to the study, they will respond to a set of screening questions, i.e., the first several questions in the survey (Attachments A-1 and A-2, with screenshots in Attachments A-3 and A-4). In addition to determining the sample of each respondent, the screening questions will confirm

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<sup>2</sup> The sampling plan will include a goal of n=100 Native American adults, but after conferring with our sample providers, we are not able to guarantee that number of completes among that audience.

whether participants prefer to take the survey in English or Spanish; their selection will determine the language that appears in the rest of the survey.

### Recruitment and Consent

We anticipate beginning this study within 2 weeks following final OMB approval. Invitations (Attachments B-1, B-2, & B-3) to participate in the survey will be sent only to participants who fit the initial study criteria:

- Adults (over the age of majority) for the base sample
- Adults (over the age of majority) and who indicate Black/African American, Hispanic/Latino, Asian, or Pacific Islander race and ethnicity for the oversamples
- Adults (over the age of majority) who are eligible for or participate in WIC or SNAP
- This initial pre-screening of participants will be based on panel member characteristics (demographics such as age and race/ethnicity) kept by the panel that were collected at the time participants joined the panel. The pre-screening of the participants is conducted using these existing electronic records and therefore does not impose additional burden on the respondents.

After participants agree to participate and electronically sign the consent form (Attachments A-1 and A-2) for the study, a privacy statement (Attachments A-1 and A-2) will be presented as a first screen for the study and will coincide with the time frame for the initiation of the research project (within 2 weeks following final OMB approval).

### Compensation

It is customary for panel providers to offer points for participation in the surveys. Accumulated points over many surveys can typically be traded for small monetary gifts, merchandise, or entry into a sweepstakes. Point systems are part of the numerous other panel management activities conducted by the panel providers to keep panelists engaged. However, the price of the sample mostly depends on incidence rates and therefore does directly correlate to the panel management cost incurred by the sample provider. Thus, when using an online sample, the Federal government does not directly provide incentives to the participants; rather, the Federal government receives access to the sample that may or may not be incentivized by the panel provider.

### Data Analysis

After completing the screener, participants who qualify will proceed to the main survey in the appropriate language, English or Spanish (Attachments A-1 and A-2, with screenshots in Attachments A-3 and A-4). The survey will contain several modules described below:

#### *Brand Funnel and Brand Attributes*

The survey will measure the participants' awareness, familiarity, and favorability towards MyPlate and other programs. This module will also gauge eligibility and participation in WIC and SNAP. Those familiar with MyPlate will be asked about program attributes, familiarity with the MyPlate logo, likelihood to engage with MyPlate, and reactions to statements regarding the



benefits of MyPlate. This data will provide a baseline measure of MyPlate's brand health and inform Campaign messaging and creative development.

#### *Mindset, Behavior, and Barriers*

Respondents will receive questions about their mindset regarding healthy eating, as well as their recent health-related behaviors. Respondents will also react to a set of statements listing potential barriers to healthy eating. In addition to providing important considerations for themes to address in Campaign messaging, these data will allow comparisons between respondents across the spectrum of health engagement and nutrition information-seeking.

#### *Demographics*

The final module will collect demographic measures not included in the screening criteria, including educational attainment, marital status, employment status, and whether or not respondents are a parent or guardian of a child under 18 years old. The bulk of the demographic data will be used to develop crosstabulations that will enable survey analysts to compare findings across key audience subgroups (e.g., race, ethnicity, or urban/suburban/rural locality).

#### *Qualitative Data*

All qualitative feedback received will be entered into an excel spreadsheet for further analysis. Qualitative data will be analyzed for high-level themes and considered descriptive and directional. No attempt will be made to generalize findings as nationally representative. Qualitative data will be used to inform Campaign creative and messaging development.

#### *Quantitative Data*

Quantitative data received will be entered into an excel spreadsheet for further analysis.

#### Outcomes/Findings

This survey will provide CNPP's first formal, comprehensive brand assessment of MyPlate and will provide a baseline measure of MyPlate brand health that can be monitored in future surveys. Research summary findings of aggregate data will be primarily for internal agency use. Some aggregate findings may be published either electronically or in print, but such documents will not include information that personally identifies any of the research participants.

### **8. Confidentiality**

The survey is anonymous and does not require the collection of any personal information. The survey collects demographic information to inform a culturally driven, audience-specific Campaign, to ask participants to share attitudes, values, and perceptions that drive decision-making, and to provide feedback on creative and messaging.

No individual identification data will be shared in reports or with the public. CNPP will not share personal data with any third parties.

Using data collection instruments in Attachments A-1 and A-2 (with screenshots in Attachments A-3 and A-4), all participants will receive a privacy statement and consent form. The privacy statement will be located on the second page of the online survey (the first page will determine whether participants would prefer to view the survey and, consequently, the privacy statement and consent form, in English or Spanish). The privacy statement will inform the participants that all opinions they provide will not be shared with anyone outside this study, except as otherwise required by law, and none of their responses will be associated with personally identifiable information (PII). Participants will also be informed that the findings will be presented as a summary.

The consent form will be located on the third page of the online survey. Participants will be required to submit electronic acknowledgement by clicking a button in the survey prior to proceeding to the rest of the survey.

Furthermore, the OMB public burden statement for this data collection will be displayed upon participants' entry into the survey. Since the OMB public burden statement will be a part of the survey instrument, no additional burden hours are associated with it.

Additionally, as part of the conditions of employment, all trained staff working on the project have signed a confidentiality agreement (Attachment C-1) prohibiting them from discussing any information about the research studies they work on with anyone not involved with the project.

## **9. Federal Costs**

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, the estimated costs equal \$5,061.71.

Contractor costs to the Federal Government will total \$148030.15 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 \$171,810.15.

If you have any questions regarding this request, please contact Dionne Duncan-Hughes, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

## 10. Research Tools/Instruments

- **Attachment A-1:** Survey (English) – includes Privacy Statement and Consent Form
- **Attachment A-2:** Survey (Spanish) – includes Privacy Statement and Consent Form
- **Attachment A-3:** Survey Screenshots (English)
- **Attachment A-4:** Survey Screenshots (Spanish)
- **Attachment B-1:** Survey Invitation (English)
- **Attachment B-2:** Survey Invitation (Spanish)
- **Attachment B-3:** Survey Invitation (English version of Spanish invitation)
- **Attachment C-1:** Confidentiality Form
- **Attachment D-1:** Determination Notice for Exempt Research