

Supporting Statement for Request for Clearance:
Prevention Communication Formative Research

OMB No. 0990-0281

Contact Information:

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SUPPORTING STATEMENT
PREVENTION COMMUNICATION FORMATIVE RESEARCH

This is a request for an extension of a previously approved collection of information (OMB No. 0990-0281). According to OMB guidance regarding generic clearance, individual memos explaining the exact methods for information collection will be submitted for each study under this clearance.

Changes in this request include updating the national hourly wage and data collection activities and related burden hours. This request builds on previous formative research approaches to place more emphasis on web-based data collection to allow greater geographic diversity among respondents, to decrease respondent burden, and to save government costs.

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Office of Disease Prevention and Health Promotion (ODPHP) is in the Office of the Assistant Secretary for Health at the U.S. Department of Health and Human Services (HHS). ODPHP was established by Congress to provide a central focus for stimulating and coordinating federal activities in prevention (Public Law 94-317, National Consumer Health Information and Health Promotion Act of 1976, Section 207, Section 7). Our office focuses on developing and disseminating prevention information to the public. Recent advances in information and communication technologies provide new opportunities for ODPHP to reach its intended professional and consumer audiences more effectively with key information, interactive tools and recommendations about disease prevention, and health promotion, including the benefits of healthy eating, increased physical activity, and preventive services.

New communication opportunities for ODPHP occur against a backdrop of increasingly urgent interest in finding effective ways to communicate health information to America's diverse population. ODPHP strives to be responsive to the needs of audiences while simultaneously serving all Americans across a range of channels, from print to new communication technologies. To carry out this mandate, ODPHP is committed to conducting formative and usability research to provide guidance on the development and implementation of communication and education efforts. This generic clearance request describes data collection activities involving methods such as: individual interviews, focus groups, web-based surveys and forms, card sorting and usability testing to garner a deeper understanding of the interests and needs of consumers and health professionals for disease prevention and health promotion information and tools.

2. Purpose and Use of Information Collection

This generic clearance request is for a revision to the use of the approved information collection assigned OMB control number 0990-0281. The request describes data

collection activities involving a limited set of research activities with consumers and health professionals to better understand their needs and preferences related to disease prevention, health promotion, and women's health products and initiatives. ODPHP will use the information collected to improve its communication, products, and services that support key office activities including Healthy People, Dietary Guidelines for Americans, the National Youth Sports Strategy, Physical Activity Guidelines for Americans, MyHealthfinder, the Move Your Way® Campaign, the President's Council on Sports, Fitness & Nutrition, health literacy and healthy aging. ODPHP communicates through its websites (www.health.gov) and through other channels including social media, print materials, webinars, interactive training modules, and reports.

Qualitative and quantitative data collection will be used, specifically, in-depth interviews, focus groups, web-based surveys and forms, omnibus surveys, card sorting, and various types of usability testing of materials and interactive tools to assess the public's understanding of health information, interest in engaging in health promotion activities, responses to prototype materials, and barriers to effective use. ODPHP will also collect information from health professionals to revise and develop communications tools that assist them in caring for patients and communicating with them clearly.

The research methods outlined in this supporting statement have five major purposes:

1. To obtain useful intended audience information for the formation of messages and materials
2. To further explore messages and materials in contexts that would be most beneficial for intended audiences
3. To identify and verify audience segmentation strategies for providing health information
4. To inform the development and refinement of user-friendly websites and other interactive tools
5. To identify user challenges and obstacles to accessing health information to guide website, material, and interactive tool development and refinement
6. To assess interest from the public in engaging in various health promotional activities

3. Use of Improved Information Technology and Burden Reduction

Remote, web-based testing is a cost-efficient method to obtain quantitative and qualitative input from a greater number of participants who are more representative of the U.S. population. Below is a description of how ODPHP will use technology, when possible, to reduce response burden.

Interviews and focus groups are recorded so that written transcripts of the interviews are available for review. Remote interviews and focus groups may be conducted by telephone or through web conferencing software.

Web-based surveys may be conducted among visitors to health.gov, or through an already existing survey tool (e.g., Alchemer).

Online and omnibus surveys may be conducted remotely and online through a survey tool such as Alchemer.

Card sorting is a common method for gaining insights from participants on how to effectively organize a website or online application. In-person card sorting is typically conducted in a one-on-one interview setting with a moderator and note taker. Web-based card sorting allows participants to use a “drag-and-drop” online interface to perform an un-moderated card sort on their own time.

Usability testing can be conducted in person or remotely using Web conferencing software. The participant’s screen and voice are typically recorded during in-person and remote sessions so they can be reviewed later for reporting purposes. Usability testing also includes online methods such as tree testing and click testing.

4. Efforts to Identify Duplication and Use of Similar Information

It is not expected that any of the information to be submitted to ODPHP during these formative research studies is duplicative or is already in the possession of the federal government. The proposed generic research will allow ODPHP to significantly improve their ability to develop and refine messages, materials, websites, and interactive tools that will be used by multiple agencies within HHS.

5. Impact on Small Businesses or Other Small Entities

Not applicable.

6. Consequences of Collecting the Information Less Frequently

If this information is not collected, the ability of ODPHP to effectively communicate health information to the American public will be compromised. For example, much remains unknown about the best ways to present messages so that individuals with low health literacy can easily access and understand crucial information on protecting and promoting their health. In addition, the emergence of new technologies requires that agencies conduct prototype testing to ensure that technology-based information and tools are easy for the public to use. There are no legal obstacles to reduce the burden.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Several data collection activities may be conducted under this request. There are no special circumstances that require the information to be collected in a manner that is inconsistent with 5 CFR 1320.5.

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

A 60-day Federal Register Notice was published in the *Federal Register* on July 24, 2024, Volume 89, Number 142, pp. 59918-59919.

No comments were received.

9. Explanation of Any Payment or Gift to Respondent

Participants will be offered a cash incentive for the time they spent engaged in formative research activities. Amounts and justifications will be determined on an individual project basis. This information will be included in the memo provided to OMB for each formative input session to be conducted.

10. Information Regarding Confidentiality Provided to Respondents

ODPHP and its contractors will follow procedures for assuring and maintaining privacy to the extent allowed by law during all stages of data collection. Respondents will receive information about privacy in an advance letter and again before the information collection sessions begin. Respondents will be informed that all information will be kept private by the research team and that comments will not be associated with their names. There will be no promise of total and absolute confidentiality for individually identifiable information unless there is a firm legal basis for withholding information in the face of a subpoena or court order or other Federal, State, or Local legislation.

Respondents in focus-group sessions will not know each other and will be asked to introduce themselves by first name only. In-person focus-group sessions will be in a room with a closed door so passersby cannot overhear the discussion. In-person research sessions will be scheduled to allow more than enough time between sessions to avoid respondents in different groups seeing each other. All in-person testing will be conducted in a private setting.

At the beginning of each testing session, the facilitator will explain that the respondents' names and addresses will not be associated with the formative input session results.

11. Justification for Sensitive Questions

No questions will be asked that are of a personal or sensitive nature.

12. Estimates of Annualized Burden Hours and Cost

A. Burden Hours

The total annual estimated burden imposed by this collection of information is 10,000 hours over a 3-year period.

| Type of Respondent | No. of Respondents | No. Responses | Average Burden per | Total Burden |
|---------------------------|---------------------------|----------------------|---------------------------|---------------------|
|---------------------------|---------------------------|----------------------|---------------------------|---------------------|

| | | per Respondent | Response (in hours) | Hours |
|---|-------|---------------------------|--------------------------------|---------------|
| Consumers (screening & omnibus survey) | 7725 | 1 | 10/60 | 1287.5 |
| Consumers (qualitative testing) | 1250 | 1 | 1 | 1250 |
| Consumers (focus groups) | 575 | 1 | 1.5 | 862.5 |
| Consumers (screening & intercepts) | 35250 | 1 | 5/60 | 2937.5 |
| Consumers (survey) | 10000 | 1 | 15/60 | 2500 |
| Consumers (gatekeeper reviews) | 325 | 1 | 30/60 | 162.5 |
| Consumers (cognitive tests) | 50 | 1 | 2 | 100 |
| Health care professionals (screening) | 1350 | 1 | 10/60 | 225 |
| Health care professionals (interview) | 75 | 1 | 1 | 75 |
| Health care professionals (focus group) | 400 | 1 | 1.5 | 600 |
| Total | | | | 10,000 |

B. Burden Cost (average hourly rate)

| Type of Respondent | Total Burden Hours | Hourly Wage Rate Respondent | Respondent Cost |
|---|---------------------------|------------------------------------|------------------------|
| Consumers (screening) | 1287.5 | \$31.48 | \$40,530.5 |
| Consumers (qualitative testing) | 1250 | \$31.48 | \$39,350 |
| Consumers (focus groups) | 862.5 | \$31.48 | \$27,151.5 |
| Consumers (screening & intercepts) | 2937.5 | \$31.48 | \$92,472.5 |
| Consumers (survey) | 2500 | \$31.48 | \$78,700 |
| Consumers (gatekeeper reviews) | 162.5 | \$31.48 | \$5,115.5 |
| Consumers (cognitive tests) | 100 | \$31.48 | \$3,148 |
| Health care professionals (screening) | 225 | \$49.07 | \$11,040.75 |
| Health care professionals (interview) | 75 | \$49.07 | \$3,680.25 |
| Health care professionals (focus group) | 600 | \$49.07 | \$29,442 |
| Total | | | \$330,631 |

The \$31.48 hourly wage rate for consumers/general public is derived from the U.S. Department of Labor, Bureau of Labor Statistics May 2023 report “National Occupational Employment and Wage Estimates United States”¹. The \$49.07 hourly wage rate for health care professionals is based on the U.S. Department of Labor, Bureau of Labor Statistics May 2023 report “National Occupational Employment and Wage Estimates United States” for Healthcare Practitioners and Technical Occupations — we are also using this labor category to encompass public health professionals. The total estimated cost for this information collection for 10,000 hours of reporting time is \$330,631.

¹ See https://www.bls.gov/oes/current/oes_nat.htm.

The number of respondents and length of response was determined based on other HHS agency's prior experience with communications testing and an estimate of the market research needs. The actual numbers will vary depending upon the topic of interest.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There will be no new annual capital or maintenance costs to the respondent as a result of this data collection.

14. Annualized Cost to the Government

ODPHP may incur the following estimated costs annually in setting up testing environments and collecting and summarizing data:

- Developing study protocols: \$50,000
- Developing study stimulus materials: \$30,000
- Moderators and usability experts to conduct research: \$15,000
- Study participant recruitment: \$20,000
- Meeting space for data collection: \$15,000
- Study participant stipends: \$15,000
- Data summary and reports: \$70,000

Estimated Annualized Cost to Government: \$215,000

These are ballpark figures, and the allocations may fluctuate depending on the study.

15. Explanation for Program Changes or Adjustments

ODPHP is proposing the following program changes:

1. Revise purpose and justification to reflect office initiatives and priorities for the next 3 years.
2. Increase total burden hours to reflect potential research needs.
3. Increase estimated hourly rate of respondents due to cost-of-living increases.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no tabulated results for this information collection.

No complex or 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. The reports will describe the testing methods, findings, conclusions, implications, and recommendations for use in development and refinement of disease prevention and health promotion messages, materials, and tools. There will be no specific quantitative analysis of data. No attempt will be made to generalize the findings to be nationally

representative.

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

Expiration date display exemption is not requested.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

The data encompassed by the projects discussed in this supporting statement will fully comply with all guidelines of 5 CFR 1320.9. No exception is requested to certification for Paperwork Reduction Act Submission.

B. Collection of Information Employing Statistical Methods

Information will not be collected requiring statistical analysis employing statistical methods.

APPENDICES

A. OMB Burden Hours Statement

B. 60 Day Federal Register Notice

C. Collection of Information Employing Statistical Methods

Appendix A

APPENDIX A: 0990-0281

Burden Hours

The total annual estimated burden imposed by this collection of information is 10,000 over a 3-year period.

| Data Collection Task | Instrument/ Form Name | # of Respondents | # Responses/ respondent | Average Burden/ Response (in hours) | Total Response Burden (in hours) |
|--|----------------------------------|-------------------------|------------------------------------|--|---|
| In-depth interviews | Screeners | 1500 | 1 | 10/60 | 250 |
| | Interview | 500 | 1 | 1.00 | 500 |
| Focus groups | Screeners | 2925 | 1 | 10/60 | 487.5 |
| | Focus Group | 975 | 1 | 1.50 | 1462.5 |
| Intercept interviews | Interview | 5250 | 1 | 5/60 | 437.50 |
| Cognitive testing of instruments | Screeners | 150 | 1 | 10/60 | 25 |
| | Cognitive Test | 50 | 1 | 2.00 | 100 |
| Web-based surveys | Screeners | 30000 | 1 | 5/60 | 2500 |
| | Survey | 10000 | 1 | 15/60 | 2500 |
| Omnibus surveys | Survey | 2100 | 1 | 10/60 | 350 |
| Gatekeeper reviews | Review | 325 | 1 | 30/60 | 162.5 |
| Card sorting | Screeners | 600 | 1 | 10/60 | 100 |
| | Card Sort | 200 | 1 | 1.00 | 200 |
| Usability and prototype testing of materials (print and web) | Screeners | 1800 | 1 | 10/60 | 300 |
| | Usability Test | 625 | 1 | 1.00 | 625 |
| TOTAL | | | | | 10,000.00 |

APPENDIX B:

Billing code: 4150-32

DEPARTMENT OF HEALTH AND HUMAN SERVICES

[Document Identifier: OS-0990-0281]

Agency Information Collection Request. 60-Day Public Comment Request

AGENCY: Office of the Secretary, HHS.

ACTION: Notice.

SUMMARY: In compliance with the requirement of the Paperwork Reduction Act of 1995, the Office of the Secretary (OS), Department of Health and Human Services, is publishing the following summary of a proposed collection for public comment.

DATES: Comments on the ICR must be received on or before **September 23, 2024**.

ADDRESSES: Submit your comments to Sherrette.Funn@hhs.gov or by calling (202) 795-7714.

FOR FURTHER INFORMATION CONTACT: When submitting comments or requesting information, please include the document identifier 0990-0281-60D and project title for reference, to Sherrette A. Funn, email: Sherrette.Funn@hhs.gov, or call (202) 795-7714 the Reports Clearance Officer.

SUPPLEMENTARY INFORMATION: Interested persons are invited to send comments regarding this burden estimate or any other aspect of this collection of information, including any of the following subjects: (1) The necessity and utility of the proposed information collection for the proper performance of the agency's functions; (2) the accuracy of the estimated burden; (3) ways to enhance the quality, utility, and clarity of the information to be collected; and (4) the use of automated collection techniques or

other forms of information technology to minimize the information collection burden.

Title of the Collection: Prevention Communication Formative Research

Type of Collection: Revision

OMB No.: 0990-0281

Abstract: The Office of Disease Prevention and Health Promotion (ODPHP) is focused on developing and disseminating health information to the public. ODPHP faces an increasingly urgent interest in finding effective ways to communicate health information to America's diverse population. ODPHP strives to be responsive to the needs of America's diverse audiences while simultaneously serving all Americans across a range of channels, from print to new communication technologies. To carry out prevention information efforts, ODPHP is committed to conducting formative and usability research to provide guidance on the development and implementation of their communication and education efforts. The information collected will be used to improve communication, products, and services that support key office initiatives including Dietary Guidelines for Americans, Food is Medicine, Healthy People, Health Literacy, Healthy Aging, Physical Activity Guidelines for Americans, the Move Your Way Campaign and the President's Council on Sports, Fitness & Nutrition. ODPHP communicates through its website (www.health.gov) and through other channels including social media, print materials, interactive training modules, and reports. Data collection will be qualitative and quantitative and may include in-depth interviews, focus groups, web-based surveys, omnibus surveys, card sorting, and several forms of usability testing of materials and

interactive tools to assess the public’s understanding of disease prevention and health promotion content, responses to prototype materials, and barriers to effective use.

The program is requesting a 3-year extension of the clearance.

Annualized Burden Hour Table

| Forms | Number of Respondents | Number of Responses per Respondents | Average Burden per Response | Total Burden Hours |
|---|------------------------------|--|------------------------------------|---------------------------|
| In-depth interviews-Screener | 500 | 1 | 10/60 | 83 |
| In-depth interviews-Instrument | 167 | 1 | 1.00 | 167 |
| Focus groups—Screener | 975 | 1 | 10/60 | 162.5 |
| Focus groups-- Instrument | 325 | 1 | 1.50 | 487.5 |
| Intercept interviews | 1750 | 1 | 5/60 | 146 |
| Cognitive testing of instruments--Screener | 50 | 1 | 10/60 | 8 |
| Cognitive testing of instruments—Cognitive test | 17 | 1 | 2.00 | 34 |
| Web-based surveys--Screener | 10,000 | 1 | 5/60 | 833 |
| Web-based surveys--Survey | 3,333 | 1 | 15/60 | 833 |
| Omnibus surveys | 700 | 1 | 10/60 | 117 |
| Gatekeeper reviews | 109 | 1 | 30/60 | 54 |
| Card sorting—Screener | 200 | 1 | 10/60 | 33 |
| Card sorting—Card sort | 67 | 1 | 1.00 | 67 |
| Usability and prototype testing of materials (print and web)—Screener | 600 | 1 | 10/60 | 100 |
| Usability and prototype testing of materials (print and web)— usability tests | 208 | 1 | 1.00 | 208 |
| Total | | | | 3,333 |

APPENDIX C

APPENDIX C: 0990-0281

Collection of Information Employing Statistical Methods

Due to the nature of the research proposed, information will not be collected requiring statistical analysis employing statistical methods.

1. Respondent Universe and Sampling Methods

A large majority of research proposed in this clearance request will utilize a convenience sample. ODPHP will partner with community organizations and other health care organizations to recruit a sample that meets the demographic characteristics of priority audiences. When needed, ODPHP will use a recruitment firm to recruit participants from their databases who meet specific screening criteria.

2. Procedures for the Collection of Information

Information will not be collected requiring statistical analysis employing statistical methods.

3. Methods to Maximize Response Rates and Deal with Nonresponse

ODPHP will not conduct mail or phone-based surveys, which cuts down on nonresponse issues. As mentioned above, most of the research will be done with a convenience sample, and ODPHP will recruit participants interested in the subject matter. ODPHP will offer a small token of appreciation to participants.

4. Tests of Procedures of Methods to Be Undertaken

ODPHP often pre-tests focus group, interview, and survey questions with fewer than 10 participants to make sure the questions and concepts are understandable. These pre-tests are done before submitting the memo to OMB for each formative input session.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

ODPHP uses several contracting firms to conduct formative research. Contractors are chosen for research projects on a competitive basis. Specific names and contact information of contractors who will design, collect, and analyze data will be included in the memo provided to OMB for each formative input session to be conducted.