U.S. Environmental Protection Agency
Information Collection Request

Title: Focus Groups as Used by EPA for Economics Projects

OMB Control Number: 2090-0028

EPA ICR Number: 2205.26

Abstract: The Environmental Protection Agency (EPA) is seeking approval for a generic information collection request (ICR) for the conduct of focus groups and one-on-one interviews related to economics projects primarily for survey development. Focus groups are groups of individuals brought together for moderated discussions on a specific topic or issue. These groups are typically formed to gain insight and understanding of attitudes and perceptions held by the public surrounding an issue. One-on-one interviews, as the term implies, are individual interviews in which a respondent is generally asked to review materials and provide feedback on their content and design as well as the thought processes that the materials invoke.

Focus groups and one-on-one interviews (hereafter referred to collectively as "focus groups") used as a qualitative research tool, have three major purposes:

- To better understand respondents' attitudes, perceptions and emotions in response to specific topics and concepts.
- To obtain respondent information useful for better defining variables and measures in later quantitative studies.
- To further explore findings obtained from quantitative studies.

Through these focus groups, the Agency will be able to gain a more in-depth understanding of the public's attitudes, beliefs, motivations and feelings regarding specific issues and will provide invaluable information regarding the quality of draft survey instruments. Focus group discussions are necessary and important steps in the design of a quality survey.

<u>Supporting Statement A</u>

1. NEED AND AUTHORITY FOR THE COLLECTION

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Over the next three years, the Agency anticipates embarking on a number of survey development efforts associated with a variety of economics projects including those related to drinking water quality, health risk reductions, coastal adaptation and restoration, to name a few. Focus groups are an important part of any survey development process, allowing researchers to directly gauge what specific issues are important to the public and providing a means for explicitly testing draft survey materials.

If this information is not collected, a vital link in developing methods to better understand the economic benefits and costs associated with Agency actions will be lost. This loss will cause further delays in the development of improved estimates of benefits and costs.

This data collection is conducted for research purposes; there are no legal requirements. The materials prepared for these discussions will fully conform to federal regulations – specifically the Privacy Act of 1974 (5 U.S.C. 552a), the Hawkins-Stafford Amendments of 1988 (P.L 100-297), and the Computer Security Act of 1987.

2. PRACTICAL UTILITY/USERS OF THE DATA

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

The information collected in the focus groups will help inform economics projects as well as economics-related surveys under development. To the extent that the surveys are ultimately successfully administered, they will serve to expand the Agency's understanding of benefits and costs of a variety of actions and could provide the means to quantitatively assess the effects of others. Participation in the focus groups will be voluntary and the identity of the participants will be kept confidential.

Focus groups generally do not yield meaningful quantitative findings and do not yield data about public opinion that can be generalized. As such, they cannot be used directly to estimate benefits and costs associated with a specific environmental action. However, program offices engaged in survey research use focus groups as an important tool to inform thinking on issues and refine ideas, especially in the survey development process. The conduct of quantitative research would need to be completed before new estimates of benefits or costs could be developed.

3. USE OF TECHNOLOGY

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.

The use of technology will vary by study. Focus groups are often audio or video recorded. Software may be used to transcribe the audio recording to text, thus reducing labor hours of manual transcription. Software may also aid in the coding of transcripts for qualitative analysis of focus group findings, further reducing labor burden hours. Some focus groups may be conducted remotely and/or electronically reducing the need for government travel.

4. 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 Item 2 above.

It is not expected that any of the information to be submitted to the EPA during these focus group studies is duplicative or is already in the possession of the Federal Government. The proposed focus groups will address the needs of the Agency and significantly improve our ability to test and redefine ideas that will allow EPA to conduct further quantitative research on various environmental economics issues.

5. MINIMIZING BURDEN ON SMALL BUSINESSES AND SMALL ENTITIES

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Small businesses, small organizations, and small governmental jurisdictions will not be required to participate in focus groups or interviews as part of this information collection.

6. CONSEQUENCES OF LESS FREQUENT COLLECTION

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.

Each focus group will be a one-time collection exercise for the enrolled participants.

7. GENERAL GUIDELINES

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with PRA Guidelines at 5 CFR 1320.5(d)(2).

Information will be collected according to the guidelines in 5 CFR 1320. Respondents will be asked to participate in one focus group and their participation will be voluntary. There will be no need for participants to maintain records or submit documents or proprietary trade secrets. There will be complete protection of any demographic information collection from participant—full names, phone numbers and addresses will not be associated with responses.

EPA has developed EPA Information Quality Guidelines (2002) to ensure the utility, objectivity and integrity of information that is disseminated by the Agency. It is EPA's intention that collection of information under this ICR will result in information that will be collected, maintained, and used in ways consistent with both the EPA Information Quality Guidelines (2002) and the OMB Information Quality Guidelines (2002). EPA intends to conduct a pre-dissemination review when the Agency prepares to disseminate information collected under this ICR.

PUBLIC COMMENT AND CONSULTATIONS

8a. Public Comment

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.

On August 28, 2025 (90 FR 42007), EPA sought comments on this ICR pursuant to 5 CFR 1320.8(d) (see Appendix 1). EPA received no substantive comments related to the notice.

Any additional comments on this ICR should be submitted to EPA and OMB within 30 days of this notice.

8b. Consultations

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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

EPA will use in-house staff and/or outside contractors (including possible contacts with the academic community) to develop focus group plans for specific areas of interest. According to OMB guidelines for generic clearances for focus groups, EPA has established an independent review process to assure the development and implementation of high-quality focus groups by EPA. This generic ICR does not obviate the need for OMB review and approval of each focus group project.

This ICR covers the conduct of focus groups related to environmental economics projects. As such, follow up with respondents regarding the accuracy of estimated burden hours is not possible as focus groups by their very nature are structured as one-time collections. Focus groups are often conducted at facilities designed for this purpose, therefore deviations from estimated burden hours are generally small.

The need for generic ICRs to facilitate the survey administration process was discussed at a workshop hosted at Resources for the Future on October 2, 2006 entitled: Sample Representativeness: Implications for Administering and Testing Stated Preference Surveys. Generic ICRs for the conduct of focus groups were specifically identified as a means of reducing review times for focus groups and enhancing Agency's ability to navigate the survey approval process. See http://www.rff.org/rff/Events/upload/32432_1.pdf for a summary of the workshop.

8. PAYMENTS OR GIFTS TO RESPONDENTS

Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

Focus groups and cognitive interviews are typically conducted through a contractor that provides the facilities and recruits the participants. The participants are generally compensated for their time by the contractor but are not paid directly by EPA.

9. ASSURANCE OF CONFIDENTIALITY

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or Agency policy. If the collection requires a systems of records notice (SORN) or privacy impact assessment (PIA), those should be cited and described here.

Each focus group will fully conform to federal regulations – specifically the Privacy Act of 1974 (5 U.S.C. 552a), the Hawkins-Stafford Amendments of 1988 (P.L 100-297), and the Computer Security Act of 1987.

10. JUSTIFICATION FOR SENSITIVE QUESTIONS

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and 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.

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

11. RESPONDENT BURDEN HOURS & LABOR COSTS

Provide estimates of the hour burden of the collection of information. The statement should:

- *Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Generally, estimates should not include burden hours for customary and usual business practices.*

  EPA estimates that, over the next three years, up to 6 studies may require focus groups and that an average of 8 focus groups will be required for each study. If 9 respondents participate in each focus group, the total number of participants would be 432, or 144 per year. Focus groups tend to last 2 hours, amounting to a total respondent burden of 864 hours, or 288 hours per year. Focus groups are a one-time collection from the participants.

- *If this request for approval covers more than one form, provide separate hour burden estimates for each form and the aggregate the hour burdens.*

  This generic ICR does not cover any forms.

- *Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included as O&M costs under non-labor costs covered under question 13.*

  The civilian average hourly wage rate is $32.52 which would bring the expected total respondent burden to $28,097. However, respondents are typically compensated by contractors for their participation at a rate that exceeds the average hourly wage.

12a. Respondents/NAICS Codes

The target population for the focus group discussions will vary by project but will generally include members of the public. The target population will be clearly defined in advance for each focus group and participants will be randomly recruited whenever feasible.

12b. Information Requested

Respondents will be asked to participate in a moderated discussion on a specific topic or issue, during which they will be asked their thoughts, perceptions, and beliefs regarding the issue. The collection will be a one-time event and there will be no need for participants to maintain records or submit documents or proprietary trade secrets. There will be complete protection of any demographic information collection from participants -- names, phone numbers and addresses will not be associated with responses.

12c. Respondent Activities

Respondents will be asked to participate in a group discussion (focus group) or a one-on-one interview (cognitive interview). The topics of discussion will vary by study. Focus groups generally last about two hours while cognitive interviews last no longer than one hour.

12d. Respondent Burden Hours and Labor Costs

Estimates of respondent burden were derived from projected focus group usage over the next three years. Each program office was asked for the number and size of the focus groups that they anticipate conducting for economics projects over the next three years. At this stage, EPA is estimating a total of six study areas over the next three years on subjects including non-fatal health risk valuation, coastal adaptation, prevention of algal blooms, and drinking water quality. In addition to these study areas, we also recognize that the timing of research-related focus group projects is clustered in nature and predictions of when these projects will occur are imprecise.

TABLE 1 – **Average Annual Respondent Burden and Costs**[1]

Approximate Number of Studies	Average Number of Focus Groups per Study	Average Number of Participants per Group	Average Hours of Duration for Each Group (includes screening)	Total Estimated Respondent Hours Over next 3 years	Annual Hour Burden	Estimated Annualized Cost to Respondents ($)[2,3]
6	8	9	2.0	864	288	$9,365.76

[1] There are no respondent capital costs or operating and maintenance costs associated with this collection of information.
[2] Average hourly rate for wages and salaries ($32.52) from "Table 1. Employer costs for Employee Compensation by ownership: Civilian workers, December 2024". U.S. Department of Labor, Bureau of Labor Statistics. (http://www.bls.gov/news.release/ecec.t01.htm)
[3] Respondents will be compensated for their time by a contractor. Those costs are reported under Costs to the Agency in question 13.

13. RESPONDENT CAPITAL AND O&M COSTS

Provide an estimate for 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 already reflected on the burden worksheet).

The cost estimate 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. The estimates should consider costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling, and testing equipment; and record storage facilities.
If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

The participants for the planned focus groups are individuals from the general public participating during non-work hours. As such, there are no capital costs or operating and maintenance costs associated with this collection.

14. AGENCY COSTS

Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

14a. Agency Activities

The Agency will develop the focus group materials, organize and conduct focus group discussions, and observe focus group discussions.

14b. Agency Labor Cost

Expenses will vary by specific project. The table below provides a hypothetical assessment of what the costs might be per year based on several assumptions regarding the level of effort required. EPA person-costs are estimated using an hourly rate for a GS-14 (step 1) based in Washington, DC in 2025 (See GS Pay Tables at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2025/GS_h.pdf). These hourly rates are multiplied by a factor of 1.6 to reflect federal labor costs (e.g., employee benefits). Time spent on each step may vary as well as the GS-level of the employees involved. Contractor costs will also depend on the location of focus groups, degree of involvement in materials preparation and whether written transcripts of each focus group are required. The estimates presented below assume that the Agency prepares all materials and that approximately 3 individuals observe each focus group.

Table 2 - **Estimated Average Annual Agency Labor Costs**

Estimated Focus Groups per Year	Estimated total labor hours for each focus group (includes preparation, observation, and analysis by	Total number of labor hours per year	Hourly labor rate x 1.6 = Federal Labor Costs	Annual Agency Labor Costs

	3 Agency employees)			
16	12	192	$109.23	$20,972.54

14c. Agency Non-Labor Costs

Estimated Focus Groups per Year	Estimated Contractor Costs per Focus Group	O&M Costs	Annual Non-Labor Costs
16	$5,000	-	$80,000

15) REASONS FOR CHANGE IN BURDEN

Explain the reasons for any program changes or adjustments reported in the burden or capital/O&M cost estimates.

The request for 864 total burden hours represents a decrease of 1,314 (=2,178-864) hours in the total estimated burden currently identified in the OMB Inventory of Approved ICR Burdens. Burden estimates derived for this (and the previous) renewal are based on projected use estimates for this generic ICR provided by the various program offices at EPA. These projections are based on anticipated, new and continuing projects over the coming three years. A decrease in burden over the previous ICR conveys simply that EPA anticipates less need for the conduct of focus groups under this ICR than in the past.

16) PUBLICATION OF DATA

For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Focus group findings are qualitative in nature and not generally published in detail. Rather, focus groups inform study design for later primary data collections that may be analyzed and published.

17) DISPLAY OF 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.

18) CERTIFICATION STATEMENT

Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

This information collection complies with all provisions of the Certification for Paperwork Reduction Act Submissions.