

**Response to OMB Notice of Action**  
Terms of Clearance from 12/10/2003  
OMB No. 0584-0524

FNS ensures that all formative research conducted is not be duplicative of work conducted among programs in FNS or CNPP. Furthermore, FNS consults with program stakeholders and CNPP to ensure that individual members of the public are not burdened by participating in multiple collections. FNS uses screening measures when conducting random sampling to ensure that individuals are not involved in multiple studies within designated periods of time.

Formative research is specific to FNS programs in that it directly involves the development of messages and materials for program providers and individuals eligible for or participating in FNS programs. Formative research performed by FNS is used specifically in support of FNS nutrition assistance programs. Current generic clearance collections include:

- Food Stamp Media Outreach Campaign
- Eat Smart, Play Hard Campaign Website Development
- Loving Your Family, Feeding Their Future Nutrition Education Concept Pretest
- Eat Smart, Live Strong: Nutrition Education for Older Adults Materials Testing

Materials produced by FNS as a result of the formative research performed is shared with and used by FNS as well as implementing agencies and participants. The purpose of the formative research is to assist in the development of relevant, useful and appropriate materials and messages for FNS populations. Screening of individuals among the public has been and will continue to be performed by the individual testing facility to determine whether or not individuals have recently participated in focus groups or interviews. If participation occurred within the last 6 months, the conversation will be terminated and the potential participant will not be considered for this particular round of testing.

**Generic Clearance to Conduct Formative Research for Development of  
Nutrition Education Materials and Related Tools for FNS Population  
Groups**

**OMB CLEARANCE PACKAGE  
0584-0524**

**September 19, 2006**

**Submitted by:  
United States Department of Agriculture  
Food and Nutrition Service  
Office of Analysis, Nutrition and Evaluation  
Nutrition Services Staff  
3101 Park Center Drive Room 1014  
Alexandria, VA 22302**

## Contents

<b>Chapter</b>	<b>Page</b>
<b>A. Justification</b>	
1. Circumstances that make the collection of information necessary.	3
2. Purpose for which the information is to be used.	5
3. Description of any technological collection techniques.	5
4. Identification of duplication efforts.	6
5. Impacts on small businesses or other small entities.	6
6. Consequences to Federal program of policy activities.	6
7. Circumstances that would cause an information collection to be conducted in a manner that is consistent with 5 CFR 1320.6.	6
8. Agency's Federal Register Notice Publication.	7
9. Decisions to provide payment or gifts to respondents.	7
10. Confidentiality provided to respondents.	7
11. Justification for questions of a sensitive nature.	8
12. Hour burden of collection information estimates.	8
13. Total annual cost burden estimates to respondents or record keepers.	9
14. Annual cost estimates to the Federal government.	9
15. Explanation of any program changes or adjustments.	10
16. Plans for tabulation and publication of information collection results.	10
17. Justification of not displaying OMB expiration date.	11
18. Explanation of exceptions to the certification statement in Item 19.	11
B. Collections of Information Employing Statistical Methods	11
C. Appendices - <b>Appendix 1</b> Federal Register Notice <b>Appendix 2</b> Supporting Documents	11

## **Supporting Statement for Paperwork Reduction Act Submissions**

### **A. Justification**

#### **1. Explain the circumstances that make the collection of information necessary.**

This information collection is based on the Child Nutrition Act of 1966, as amended, the National School Lunch Act of 1966, as amended, the Food Stamp Act of 1977, as amended, the Agriculture and Consumer Protection Act of 1973, as amended, and the Emergency Food Assistance Act of 1983, as amended (Appendix 2). This request for approval of information collection is necessary to obtain input into the development of nutrition education materials and related tools for population groups served by the U.S. Department of Agriculture - Food and Nutrition Service (USDA-FNS) (Federal Register Notice – Appendix 1).

Diet has a significant impact on the health of citizens and is linked to four leading causes of disease, which can reduce the quality of life and cause premature death. While these diet-related problems affect all Americans, they have a greater impact on the disadvantaged populations reached by many of the FNS programs. One of FNS' goals includes improving the nutrition of children and low-income families by providing access to program benefits and nutrition education. The FNS programs include Child Nutrition, Food Distribution, Food Stamp and Supplemental Foods Programs.

The basis of our approach rests on the philosophies that all health communications and social marketing activities must be science-based, theoretically grounded, audience-driven, and results-oriented. Secondly, consumer-based health communications require a focus on specific target audiences, encouraging positive behaviors in culturally relevant ways, unique benefits and supports for adopting the new behavior, insights into the most appropriate time and place to deliver messages, and striking the right tone to enhance attention and action to the message. Interventions and program activities need to be crafted and conducted in such a way that they can be delivered through different types of media and in an array of formats for diverse audiences.

FNS continues to develop initiatives and materials for the nutrition education and promotion campaign, entitled Eat Smart. Play Hard.™ (the Campaign). The Campaign is designed to convey science-based, behavior-focused nutrition messages about healthy eating and physical activity to children eligible to participate in FNS nutrition assistance programs and their caregivers. The messages are based on the current *Dietary Guidelines for Americans (DGAs)* and *MyPyramid*. Including the Campaign formative research activities, approval was granted for eleven data collection requests under the current approval:

- Nutrition Education Public Service Advertising
- Food Stamp Media Outreach Campaign
- Eat Smart, Play Hard Website Development
- Eat Smart, Play Hard: Power Panther Maximization
- Low Literacy Dietary Guidelines for Americans Concept Pretest
- Eat Smart, Live Strong Materials Testing
- Food Stamp Outreach Online Survey
- Food Stamp Education and Administrative Reporting System Concept Testing
- Low Literacy Dietary Guidelines for Americans Concept Testing
- Food Stamp Media Outreach Concept Testing
- Eat Smart, Play Hard Public Service Announcements

Future activities will support program specific projects such as the Nutrition Education Public Service Advertising Campaign, which will use social marketing efforts for outreach to raise awareness about and promote prevention of obesity among nutrition assistance populations; Food Safety Education Messages for the FNS Population, which will develop materials for FNS cooperators and participants; request for abstracts for the FNS National Nutrition Education Conference and future regional conferences and conducting various types of formative research to update Team Nutrition and WIC materials to reflect the most current information in the *Dietary Guidelines* and *MyPyramid*.

Formative research methods and information collection will include focus groups, interviews (dyad, triad, telephone, etc.), surveys and web-based information gathering tools. According to OMB guidance regarding this generic clearance, individual memos

explaining the exact method for information collection will be submitted as well as copies of the tool or instrument to be used in gathering the data.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information collected by FNS or its contractor will provide formative input and feedback on how best to reach and motivate the FNS target population. The data obtained will provide input regarding the potential use of materials and products during both the developmental and testing stages. In order to determine future nutrition education and outreach needs, tools and dissemination strategies, key informant interviews will be conducted. This task involves collecting a diverse array of information from a variety of groups including perspectives from people familiar with: the target audiences; the objectives of nutrition education and outreach interventions and projects; program constraints at State and local levels; and related issues. Expert opinions from program constituencies, researchers, and practitioners will be collected through interviews, surveys and other methods. FNS will also collect information regarding effective nutrition education and outreach initiatives being implemented by State agencies that administer nutrition assistance programs to address critical nutrition and program access issues. The information is not nationally representative and no attempt will be made to generalize the findings to be nationally representative or statistically valid.

Fundamental to FNS' success in delivering science-based nutrition messages and reaching diverse and low literacy segments of the population is obtaining qualitative feedback from key components of the target audience on the communication strategies and interventions that will be developed. This formative research is essential to advancing Eat Smart. Play Hard.<sup>TM</sup> as well as other FNS nutrition education and outreach efforts. The formative input and testing methods described in this request will assist in the development of more effective tools and communication strategies. Collection of this information will increase FNS' ability to formulate nutrition education and outreach interventions that resonate with the target population of low-income American families, who have the highest need and can derive the most benefit.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical or other technological collection techniques.**

FNS makes every effort to comply with the E-Government Act. Focus groups concerning Web-site development will be accomplished via computers. As part of professional staff information collection, electronic information gathering may be implemented. The focus group discussions and interviews may be video or audio taped and transcribed to maximize access to detail.

**4. Describe efforts to identify duplication.**

This information collection will build on and not duplicate any prior research. As previously stated, formative input and feedback will result in how best to reach and motivate the FNS target populations. The data obtained will provide input regarding the potential usability of new materials, products and dissemination methods during both the developmental and testing stages.

**5. Describe the impacts on small businesses or other small entities.**

The information collection will not have an impact on small businesses or other small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

Failure to collect information would decrease the efficacy of all intended interventions. If FNS does not collect this information, valuable input from FNS' culturally and ethnically diverse populations would not be obtained. Research has consistently shown that testing of materials and incorporation of target audience feedback in the development of messages and materials is critical for effective educational efforts. This information collection will assist in the development and conveying of messages based on the current *Dietary Guidelines for Americans* to the target audience including the low-literate populations that are generally at risk for developing diet-related health problems such as obesity.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.6.**

Reporting will occur when necessary in order to carry out multiple information collections for various projects. No recurring requirements will be necessary as each information collection will be a one-time collection.

**8. Provide a copy and identify the date and page number of publication in the Federal Register of the Agency's notice.**

Agency Information Collection Activities; Proposed Collection; Comment Request-Generic Clearance to Conduct Formative Research for Development of Nutrition Education Materials and Related Tools for Food and Nutrition Service Population Groups was published in the Federal Register, Volume 71, Number 128, Wednesday, July 5, 2006 (Appendix 1).

**a. Describe the efforts to consult with persons outside the Agency to obtain their views on the availability of data and frequency of collection.**

The Federal Register Notice was published and was available to the public for a period of 60 days. No comments were received.

**b. Consultation with representatives of those from whom information is to be obtained.**

The 60-day notice was published in the Federal Register allowing the public an opportunity to comment on this collection.

**9. Explain any decision to provide any payments or gifts to respondents.**

Focus group and selected interview participants will receive a cash stipend intended to reimburse for expenses such as transportation and childcare costs. 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 research project to be conducted.

**10. Describe any assurance of confidentiality provided to respondents.**

FNS and Contractors will follow procedures for assuring and maintaining confidentiality consistent with the Privacy Act during all stages of data collection. Focus group participants will receive information about confidentiality in an advance letter and/or before the focus groups begin. Participants in the semi-structured intercept interviews and telephone interviews will receive information about confidentiality before beginning the interviews. When appropriate, respondents will be informed that all information will be kept strictly confidential by the information collection team and will not be associated with their names. Release forms for focus groups and interviews will cite the Privacy Act.

**11. Provide additional justification for any questions of a sensitive nature.**

Information collection will not involve questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information.**

**a. Indicate the number of respondents, frequency of responses, annual hour burden, and an explanation of how the burden was estimated.**

Research Method	Respondents	Responses per Respondent	Time per Response in Minutes	Total Annual Burden in Minutes	Total Annual Burden in Hours
Focus Group Screeners	3000	1	10	30,000	500
Interview Screeners/Surveys	1400	1	10	14,000	233
Focus Groups	1500	1	120	180,000	3000
Intercept Interviews	800	1	30	24,000	400
Dyad/Triad Interviews	200	1	60	12,000	200
Telephone Interviews	1500	1	15	22,500	375
Surveys	800	1	30	24,000	400
Web-based Collections	800	1	30	24,000	400
Confidentiality Agreements	9000	1	10	90,000	1500

Total	10,000		420,500	7008
-------	--------	--	---------	------

The total estimated burden is 7,008 hours. Estimates are based on both historical numbers of respondents from past projects as well as projections for projects to be conducted in the next three years.

**b. Provide estimates of annualized cost to respondents for the burden hours**

for collections of information.

Testing Instrument or Method	Total Burden Hours	Hourly Rate (\$)	Total Cost
Focus Group Screeners	500	13.72	6,860.00
Interview/Survey Screeners	233	13.72	3,196.76
Focus Groups	3000	13.72	41,160.00
Intercept Interviews	400	13.72	5,488.00
Dyad/Triad Interviews	200	13.72	2,744.00
Telephone Interviews	375	20	7,500.00
Web-based Collections	400	13.72	5,488.00
Survey Instruments	400	20	8,000.00
Confidentiality Agreement	1125	13.72	15,435.00
	375	20	7,500.00
<b>Total</b>	<b>7,008</b>		<b>\$103,371.76</b>

<sup>1</sup> \$13.72 hourly rate for nonprofessionals/adults (\$5.15 minimum wage + \$8.57 child care).

<sup>2</sup> \$20.00 hourly rate for professionals.

**13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.**

For the respondents there are no capital or operating and maintenance costs associated with this collection. The only cost to respondents will be value of the time spent responding as explained in chart above.

**14. Provide estimates of annualized cost to the Federal government.**

The Agency incurs costs in setting up testing environments to include such things as hiring contractors, facilitators or moderators, renting meeting space, in providing cash stipends, etc. Costs will be determined on an individual project basis and will be included in the memo provided to OMB for each formative research project to be

conducted. Based on historical data we expended \$466,392.00 over the last three years. (Annualized this amount would be \$155,464.00.)

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

FNS is requesting a total burden of 7,008 hours. This is an increase of 842 hours of the currently approved amount of 6,166. This is a current information collection. The total burden constitutes an adjustment to meet the estimated future demand of FNS formative research needs. This OMB submission is for individual data collection events, which will consist of one-time information collections or data collections over a specific period of time.

**16. Address any complex analytical techniques that will be used for collection of information whose results will be published. Outline plans for tabulation and publication.**

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 submitted to USDA-FNS. The reports will describe the focus group and interview testing methods, findings, conclusions, implications, and recommendations for use in the development of nutrition education and outreach materials for FNS population groups. In the reports, the Contractors will address recommendations for messages developed and effective dissemination strategies. The reports will also describe some of the factors that may influence the target audience in making behavior changes. There will be no extensive quantitative analysis of data. No attempt will be made to generalize the findings to be nationally representative or statistically valid.

After data collection has been completed, it is anticipated that the findings will be reported in appropriate journals and at appropriate nutrition meetings and conferences to disseminate information to those who interact with the same target audience. Information on State initiatives will be summarized and published on the FNS Web site periodically.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

FNS is not seeking exemption from this requirement.

**18. Explain each exception to the certification statement identified in Item 19.**

There are no exceptions to the certification statement being requested.

**B. Collections of Information Employing Statistical Methods**

Information collected will not require statistical analysis.

**C. Appendix 1: Federal Register Notice**

**Appendix 2: Supporting Documents**

- a. [Child Nutrition Act of 1966](#), as amended
- b. [National School Lunch Act of 1966](#), as amended
- c. [Food Stamp Act of 1977](#), as amended
- d. [Agriculture and Consumer Protection Act of 1973](#), as amended
- e. [Emergency Food Assistance Act of 1983](#), as amended