U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410

DEC 30 2011

Mr. Thomas J. Graves
Vice-President, General Counsel, and
Corporate Secretary
American Coatings Association
1500 Rhode Island Avenue, N.W.
Washington, DC 20005

Dear Mr. Graves:

This letter responds to your June 11, 2010, Information Quality Guidelines (IQG) Request for Correction (Request), which was submitted to the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Housing and Urban Development (HUD), on behalf of the American Coatings Association (ACA). In your Request, the ACA challenges the objectivity and utility of information in a national childhood lead poisoning prevention multimedia public service advertising (PSA) campaign sponsored by EPA, HUD, the Coalition to End Childhood Lead Poisoning and the Ad Council (the "Partners").

The national childhood lead poisoning prevention PSA campaign was developed by the Ad Council under a cooperative agreement funded by EPA and HUD and administered by EPA. The non-profit Coalition to End Childhood Lead Poisoning is also a key sponsor of the PSA campaign and provides additional separate funding to the Ad Council for the campaign. The purpose of the PSA campaign is to educate the target audience (parents and caregivers of children under six years old) about the potential dangers of childhood lead poisoning to motivate them to take action to learn more, and to empower and provide them with information and access to resources to prevent or address lead hazards.

EPA and HUD believe the information presented in the childhood lead poisoning prevention PSA adheres to the objectivity and utility standards established in the Office of Management and Budget (OMB) *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies*[1], as well as Information Quality Guidelines established by EPA[2] and HUD[3] respectively.

Concern about the PSA graphics. ACA raises concerns about the graphics used in the lead poisoning prevention PSA and maintains that the images are not accurate depictions of a recognized exposure pathway for lead. ACA indicates its view that this PSA does not represent "honest, straightforward, and

[1] Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies, OMB, 2002 (67 FR 8452, February 22, 2002).
[2] 67 FR 63657, October 15, 2002.
http://www.epa.gov/quailty/informationguidelines/documents/EPA_InfoQualityGuidelines.pdf.
[3] 67 FR 69642, November 18, 2001. http://www.hud.gov/offices/adm/grants/qualityinfo/fr4769n02-final.pdf

readily discernable messaging." This PSA, like other public service advertisements generally, is intended to make an impact and attract the viewer's attention in a way that will motivate the viewer to take action to learn more. The eye-catching discordant images of a rusted paint can pouring into a bottle, sippy cup, or cereal bowl is a metaphor that conveys the message old paint and young children is a harmful combination. The text accompanying the graphics also prompts viewers to stop and reconsider that the lead paint issue is still a problem. Children can ingest paint scrapings and dust that remains after the painting, and, in older homes, children may be at risk of lead poisoning from ingestion of these lead-based paint hazards.

Powerful imagery is often used in public service advertising to convey a key message to viewers about an issue of public importance. For example, the image of two beer mugs toasting and breaking apart conveyed the dangers of drunk driving as a result of social drinking in the Ad Council/U.S. Department of Transportation "Friends don't let friends drive drunk" PSA campaign.

The text of the childhood lead poisoning prevention PSA provides context for the image and useful information to the intended audience. The text provides a clear, accurate and unbiased description of:

- the fact that lead poisoning still affects a very large number of children today;
- the serious adverse health effects associated with elevated blood lead levels in young children;
- the link between pre-1978 housing and lead-based paint hazards;
- places in the home where lead-based paint is often found, namely walls, doors, windows and sills; and
- the fact that a very small amount of lead can poison a child.

The inclusion of a Web page link and toll-free hotline where viewers can get more information enhances the utility of the PSA. In short, the information provided deals with the substantive content that lead hazards are transmitted through many ways, including contact and ingestion and that lead-based paint exposure has long been one of the most common causes of clinical lead toxicity[4].

As part of its well-established Research and Evaluation Process[5] for campaign development, the Ad Council conducted extensive, and iterative, primary research prior to the release of the PSA's in April 2010 to refine the content and graphics for each of the childhood lead poisoning prevention PSAs. This process involved a literature review, exploratory research, communications checks as well as a post-launch assessment.

In June 2009, the Ad Council conducted a Lead Awareness Study[6] consisting of six focus groups of mothers with children six or younger and pregnant women from differing demographics in different regions of the country. The results of this study indicated that the target audience had limited awareness of childhood lead poisoning and their role in protecting children in their homes. The focus groups identified the important elements of a PSA, including the health effects to children from exposure to lead, the number of children poisoned, and the small amount of lead dust required to make a home toxic. This exploratory research laid the foundation for the development of four potential creative concepts, which were discussed with the Partners. Two creative concepts ("Pour" and "Cracks") were selected for further review. "Pour" was the creative concept ultimately selected by the Ad Council for the PSA;

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[4] USEPA Air Quality Criteria for Lead, EPA/600/R-5/144aF, October 2006, p. E-6.

[5] Research and Evaluation Procedures, Ad Council - http://www.adcouncil.org/Impact/Research/Overview-of-Ad-Council-Research-Evaluation-Procedures.

[6] Ad Council Lead Awareness Study, Qualitative Research Report, Kudzu, June 22, 2009. This information is enclosed.

"Cracks" used the image of cracks on the walls spelling out "violent behavior," "brain damage," and "convulsions" in several settings (a young girl's play room, a baby's room with a crib, and an older child's room) to emphasize the potential adverse health effects associated with lead poisoning.

In November 2009, these two campaign ideas were tested qualitatively among mothers of young children and expectant mothers in six focus groups (four in English and two in Spanish) in two different regions of the country. The research found that, while both campaigns were salient, relevant and motivating, "Pour" was more effective at prompting action. The report concluded that "[t]he visual power of "Pour" is hard to escape, whereas "Cracks" gives the viewer more chance to disengage…or misinterpret…."[7] Consequently, the "Pour" concept was used in the PSA campaigns. Throughout the PSA development process, the Partners, target audience, and the Campaign Review Committee (the advertising industry's committee of communications experts), provided input and review of the concepts being considered.

In June 2010, the Ad Council in collaboration with the Coalition to End Childhood Lead Poisoning conducted a post-launch assessment of message comprehension in a nationwide copy test.[8] The copy test included 200 members of the target audience (parents of children 0-6 years old). The results of the copy test indicate that 80% of respondents understood that harmful effects of lead paint exposure or the harmful effects specifically to children were the main message of the ads. At least 75% of respondents also said the PSAs were clear, believable, relevant and motivating. Eighty-one percent of the respondents indicated that the PSAs made them want to visit a Web site to learn more. The results of the copy test demonstrate the utility of the PSAs to the intended audience and that the lead poisoning prevention message is readily discernable.

Concern about the PSA text. The ACA Request also raises a concern about the accuracy of the PSA's phrase "lead paint poisoning affects over one million children today" and contends that this number is not consistent with the Centers for Disease Control and Prevention (CDC) estimate of 250,000 children aged 1-5 years with blood lead levels greater than 10 micrograms of lead per deciliter of blood.

The President's Task Force on Environmental Health Risks and Safety Risks to Children [9]states, "No single definition of 'lead poisoning' suits all purposes." For the purposes of that report, published in 2000, "the term 'lead poisoning' is used to describe blood lead levels of 10 µg/dL or above in children under six." Likewise, CDC's Childhood Lead Poisoning Prevention Program has identified blood lead levels greater than 10 micrograms of lead per deciliter of blood, as "the level at which CDC recommends public health actions be initiated". However, CDC also recognizes that "No safe blood lead level has been identified"[10]. Accordingly, the CDC's National Center for Health Statistics monitors blood lead levels well below 10µg/dL (e.g., limit of detection for blood lead is below 1 µg/dL) in its National Health and Nutrition Examination Survey (NHANES) program. To this same end, The Forum on Child and Family Statistics points out that "A blood lead level of 10 micrograms per deciliter (µg/dL) or greater is considered elevated, but adverse health effects can occur at much lower concentrations."[11]

There is substantial scientific evidence that lead causes significant adverse health effects at levels below

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[7] Lead Poisoning Creative Research, Topline Report, Ted Manager, November 19, 2009. This information is enclosed.
[8] Lead Poisoning Prevention Copy Test – Message Comprehension, Ad Council and Coalition to End Childhood Lead Poisoning, June 28, 2010. This information is enclosed.
[9] Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards, February 2000. http://yosemite.epa.gov/ochp/ochpweb.nsf/content/leadhaz.htm/$file/leadhaz.pdf.
[10] http://www.cdc.gov/exposurereport/Lead_FactSheet.html.
[11] http://www.childstats.gov/americaschildren/phenviro4.asp.

10 micrograms of lead per deciliter (µg/dL) of blood. Exposures to low levels of lead early in life have been linked to effects in IQ, learning, memory and behavior.[12] EPA has promulgated regulations intended to prevent the adverse health effects that may occur at these lower levels. For example, in setting its National Ambient Air Quality Standards (NAAQS) regulations for Lead,[13] EPA relied, in part, on studies showing adverse effects of lead on populations of children with average blood lead levels of approximately 3-4 µg/dL. In a recent Science Advisory Board review[14] of EPA's *Approach for Developing Lead Dust Hazard Standards for Residences* (November 2010 Draft), "The SAB supports EPA's selection of target blood lead concentrations of 1.0 and 2.5 micrograms per deciliter for children. The SAB does not support the high target blood lead concentration of 5 micrograms per deciliter due to recent studies indicating significant adverse health effects in children with blood lead concentrations well below 10 Recognizing the evidence of adverse effects of lead occurring below 10 µg/dL, the one million number is derived from the 2003-2006 National Health and Nutrition Examination Surveys (NHANES) data of children with blood lead levels at or greater than 5 micrograms per deciliter.[15]

In addition, the CDC, was consulted in the development of the childhood lead poisoning prevention PSA campaign. CDC continues to use 10 µg/dL as the blood lead level for individual interventions, however, CDC recommends primary prevention through elimination of lead hazards and other childhood lead exposures as the first line of defense against childhood lead poisoning. The HUD and EPA goal for the childhood lead poisoning prevention PSA campaign is to raise awareness and promote prevention of all lead poisoning, regardless of whether medical interventions are effective.

Concern about the PSA purpose. As noted above, the purpose and intent of the childhood lead poisoning prevention PSA campaign is to educate parents and caregivers of children younger than six about the potential dangers of childhood lead poisoning, and to provide them with information and access to resources to prevent or treat any related hazards. The ACA Request erroneously suggests that the main purpose of the childhood lead poisoning prevention PSA campaign is to raise awareness about EPA's Lead Renovation, Repair and Painting program rule (RRP rule). In fact, the Ad Council campaign is designed to raise awareness of the childhood lead poisoning issue broadly. EPA has its own separate and more targeted RRP-focused outreach effort underway aimed at educating contractors and those who are planning renovation, repair and painting activities about the RRP rule's new requirements. This effort also focuses on raising awareness among consumers about the importance of hiring an EPA lead-safe certified contractor. The Ad Council's PSA campaign complements the Agency's separate effort to raise awareness of the RRP rule requirements.

EPA and HUD believe the objectivity and utility of the information in the lead poisoning prevention PSAs as determined by the extensive research with the audience focus groups are appropriate for its intended use and the intended audience. The childhood lead poisoning prevention PSA research and evaluation process described in this response enhanced the objectivity and utility of the information. Also, the information found in the text of the PSAs is reliable, accurate, clear and unbiased. As stated above, the quality of the information included in the childhood lead poisoning prevention PSAs, including its objectivity, utility and integrity, was thoroughly reviewed. For these reasons, EPA and HUD are not granting your Request for withdrawal of agency participation and sponsorship of the

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[12] U.S. EPA. Air Quality Criteria for Lead (2006) Final Report. U.S. Environmental Protection Agency, Washington, DC, EPA/600/R-05/144aF-bF, 2006, (Sections 6.2.6, 6.2.7, 8.4.2.2, 8.4.2.3).

[13] National Ambient Air Quality Standards for Lead; Final Rule; 73 FR 66964, November 12, 2008.

[14] http://yosemite.epa.gov/sab/sabproduct.nsf/0/CD05EA314294B683852578C60060FB08/$File/EPA-SAB-11-008-unsigned-revised.pdf.

[15] http://www.cdc.gov/nchs/nhanes.htm.

childhood lead poisoning prevention PSAs.

If you would like to appeal this decision, the guidelines allow you to submit a Request for Reconsideration (RFR). The EPA and HUD request that any RFR be submitted within 90 days of the date of this response. HUD is waiving its 60-day deadline so that, if you choose to submit an RFR, you may submit the same one to both agencies within the longer of the two agencies' submittal periods. If you choose to submit an RFR, please send a written request both to the EPA and HUD via mail, electronic mail or fax, as follows:

EPA: Mail: EPA Information Quality Guidelines Processing Staff , Mail Code 2811R, U.S. EPA, 1200 Pennsylvania Avenue, NW, Washington, DC 20460;
Electronic mail: quality@epa.gov; or
Fax: (202) 565-2441.

HUD: Mail: Executive Secretariat Division, U.S. Department of Housing and Urban Development, 451 Seventh Street, SW (10139), Washington, DC 20410
Electronic mail: infoquality@HUD.gov; or
Fax: (202) 619-8365.

More information on submitting an RFR is available from the EPA and HUD Information Quality Guidelines websites, http://www.epa.gov/quality/informationguidelines/ and http://portal.hud.gov/portal/page/portal/HUD/program_offices/administration/grants/qualityinfo.

Sincerely,

James J. Jones
Acting Assistant Administrator
Office of Chemical Safety and Pollution Prevention
U.S. Environmental Protection Agency

Jon L. Gant
Director
Office of Healthy Homes and Lead Hazard Control
U.S. Department of Housing and Urban Development

Enclosures (3):
Ad Council Lead Awareness Study, Qualitative Research Report, Kudzu, June 22, 2009.
Lead Poisoning Creative Research, Topline Report, Ted Manager, November 19, 2009.
Lead Poisoning Prevention Copy Test – Message Comprehension, Ad Council and Coalition to End Childhood Lead Poisoning, June 28, 2010.

cc: Malcolm D. Jackson, Assistant Administrator and Chief Information Officer, Office of Environmental Information, U.S. EPA
Lisa Danzig, Director, Office of Strategic Planning and Management, U.S. HUD
Wendy Cleland-Hamnett, Director, Office of Pollution Prevention and Toxics/OCSPP, U.S. EPA
Monica D. Jones, Acting Director, Office of Environmental Information, U.S. EPA
Barbara S. Dorf, Director, Senior Advisor, Grants Management Oversight, U.S. HUD

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Enclosure 1:

See reference to this enclosed document in Footnote No. 6 of RfC 10002:

Ad Council Lead Awareness Study, Qualitative Research Report, Kudzu, June 22, 2009.

AD COUNCIL LEAD AWARENESS STUDY
QUALITATIVE RESEARCH REPORT
6/22/09

Background

There are an estimated 38 million homes in the United States known to contain lead-based paints. Lead is a powerful and detrimental neurotoxin, which can have serious negative effects on normal brain development in young children and babies in utero.

A national public service campaign is needed to raise awareness about the dangers of leaded dust, how to recognize potential hazards and what proactive steps can be taken (among local and national resources), to ensure homes are safe and lead-free.

Objectives

Determine the most motivating message that will make Mothers and Mothers-to-be take action against the threat of lead poisoning in their homes.

Methodology

Qualitative Exploration: (6) focus groups total, (3) per market in Houston and Philadelphia. Recruit 6 for 4-6 to show. Groups were 1.5-2 hours in length, specifically:

Houston, 6/4

- 2 groups Caucasian mothers with children 0-6
- 1 group Hispanic mothers with children 0-6

Philadelphia, 6/5

- 2 groups Caucasian pregnant women
- 1 group Hispanic pregnant women

Detailed Findings

I. What Moms Fear, in General

- In general, Moms are extremely aware of and focused on protecting their children from a number of possible, negative outcomes, from physical accidents to inadvertent poisoning to abduction. Being a parent means on-going vigilance and attention to their surroundings, particularly in a world where there are so many toxins and uncertainties (e.g., Swine Flu).
    - *"I pay attention to everything"*
    - *"I fight to protect my children from poisons everyday"*
    - ***"You just can't take your eyes off them… it only takes a second for something to go wrong" (Hispanic mom)***

- Mom's greatest fears were of sudden, uncontrollable events that can happen outside the home. Accidents, losing children, and abduction were the top three:
    - *"You hear it on the news all the time, and you worry someone's going to take your child"*
    - *"It's what you can't control"*
    - *"Stuff that can hurt them. Things they can find"*
    - ***"We wish we could be with our kids every minute, but we can't" (Hispanic mom)***

- Following these sudden, devastating possibilities, was a long list of hazardous substances and unsafe materials that could occur inside the home. Most mothers claimed to lock away or kept out-of-reach, power tools, cleaning supplies, plastic/dry cleaning bags and medicines. A few claimed to be "germ freaks," and/or conscious of electrical wiring, but these were lower on the list of concerns.
    - *"They can climb, so I have to place everything way out-of-reach"*
    - *"He gets into everything, so I have to lock everything up"*

- **Among Hispanic moms, a top mention was the electrical outlets and cleaning substances. There were a few un-aided mentions of lead poisoning, more so in Philadelphia. Hispanic moms also mentioned they worried that their small children would hurt themselves on furniture with sharp edges and staircases.**

- Mothers of boys in particular, feared their sons could fall from heights and had taken precautions, via fencing to prevent them from climbing on cabinets and TV tables.
    - *"I keep the kitchen closed off so he can't get in there"*
    - *"I've heard that an entire TV fell on a boy and crushed him. I'm always pulling him of tables"*

- While one pregnant woman had already safeguarded her home, the majority focused on those substances that were toxic to the growing fetus -- solvent fumes, mercury in fish, and imported unpasteurized cheeses. One woman avoided dry cleaning bags for the toxins they might carry. Their awareness of potential hazards was received through friends/family and pre-natal doctor visits.
    - *"Medicine I take for my thyroid problem"*
    - *"Fumes from cleaning solvents. I buy green cleaners now"*
    - *"Mosquito sprays"*

- **Among Hispanic moms there was very little mention or awareness about the negative side effects that toxics have for the unborn baby. Moms were more worried about the now, and they made sure to "eat healthy for the 'baby'"**

- **Both General Market and Hispanic** mothers claimed to receive information on child safety issues/treatments from a variety of different sources. They gathered printed materials, such as pamphlets and brochures, from their doctor's office or Hospital waiting area. They received many e-mails from their school nurse, community groups, Mom's Groups, and friends/family alerting them to a recent outbreaks and other dangers. They also did quite a bit of searching online at websites like WebMD and (for the pregnant Moms) BabyCenter. Parenting magazines were also sited as a place to learn about child safety issues.
    - *"The Texas Learning Hospital has hand-outs"*
    - *"I always read the brochure in the waiting room at my doctors' office"*
    - *"I get tons of stuff. I have to confess I don't read it all"*
    - *"I got this list of poisons and what to do. It's on my refrigerator"*

- **Among Hispanic moms one key additional source of information was magazines (i.e. Parents), followed by television. Word of mouth was also key among all groups. Family information or "recommendations" was also a resource.**
    - *"My friend's toddler was affected by lead poisoning... she was lucky"*

II. Lead Awareness/Attitudes

- Lead was neither top-of-mind nor considered a topical issue for the majority of respondents in both cities. **Among Hispanic moms there was one mention in Houston, and a few more in Philadelphia on an un-aided basis.** There was universal disbelief that lead could still be an issue, especially in Houston where housing was built more recently (most respondents lived in houses built after 2000). Some respondents

in Philadelphia did know that lead paint was phased out in the late '70's. However, they believed the problem was over, as layers of non-lead paint had covered the lead paint, and government sponsored abatements had taken care of the problem where it was severe.
    - *"Buildings are newer now, that was a long time ago"*
    - *"I assumed it was over"*
    - *"No one ever talks about it. You just assume it isn't a problem anymore"*

- **Among Hispanic mothers the issue of lead was not such a "worry", but more of a lack of knowledge.**
    - *"I feel so useless not knowing about the dangers of lead before"*
    - *"Lead could be affecting my family, and I would never be able to notice"*

- Respondents did remember the Chinese lead toy incident in Winter '08, but felt it was a one-time event and that the problem had been remedied. They depend on TV news to inform them of serious problems – but if the news is not talking about it, they assume it's over.
    - *"I went all around my house tossing toys"*
    - *"That was the last time I thought about lead paint"*
    - *"You kind of depend on the news to tell you what's important"*

- **Among Hispanic moms there was no recall about the Chinese incident specifically, but they did mention that lead could be found on certain types of toys.**

- The majority of Moms, **General Market and Hispanic,** had no idea what lead poisoning meant, both the causes and the symptoms, **or how they could protect their family from it**. **Some Hispanic moms had the impression that making their home "lead-free" would be expensive and tedious.**

- Many misperceptions exist about lead's toxicity, particularly regarding the *amount* of lead necessary to cause damage. Importantly, Moms were not aware of lead "dust" and only thought significant exposure to lead chips could cause poisoning.
    - *"I don't know, it takes like ½ cup of paint chips (to cause lead poisoning?)"*
    - *"It's from chewing on window sills?"*
    - *"Stained glass has lead"*
    - *"Can you breathe lead?"*

- **Among Hispanic moms there was some confusion with lead and "asbestos". Some thought one caused the other.**

- Only a few knew there was a connection to neurological disorders and/or death. **Among Hispanic moms in Philadelphia the incidence was higher.** Two **General Market and one Hispanic** women in

Philadelphia did have direct experience with lead poisoning when their toddlers were tested at high levels. But since there were no obvious symptoms and the levels were low, nothing was done about it. **With the exception of one Hispanic mom who sought treatment for her child and according to her, her child had been cured.**

- *"It makes you sick in some way, but I don't know how"*
- *"Like being poisoned, you throw up…"*
- *"I really don't know…"*
- *"Neurological issues? Death?"*
- ***"It affects your blood, your breathing, your brain" (Hispanic moms)***
- ***"It can be mortal" (Hispanic mom)***
- ***"It is a ghost killer because you can't see it" (Hispanic mom)***
- ***"Affects children with asthma, I think, but don't know how" (Hispanic mom)***

- Once the actual effects of lead poisoning were revealed, Mothers became highly fearful for their children, and questioned why their doctors **or any other public service organization (school)** had not made it a more top-of-mind issue. **With the exception of some Hispanic moms who were asked to test their children for lead, most** expressed outrage that their doctors did not tested their toddlers as a part of their yearly check-ups.
  - *"I cannot believe the doctors aren't testing for this"*
  - *"It should be on the wall… what to look out for, what to do…"*
  - *"This should be a regular blood test, given every year"*
  - ***"They make the vaccinations a routine need, why can't they add this to it?" (Hispanic mom)***

- Pregnant women tended to think that their fetuses were better protected from lead as their bodies served as a buffer. Most Moms-to-be were surprised that the issue of lead was not discussed in pre-natal visits. **Among Hispanic pregnant women there was not mention of the affect it can have on her unborn baby.**
  - *"Here I was pregnant and the doctor knew we were renovating, and she only said – "you don't want to be near that." What about my other kids?"*
  - *"My doctor never even mentioned it"*
  - ***"All I remember is my dad telling me 'stay away from here, don't breathe this' when they were painting our house" (Hispanic mom)***

III. Concept Statements Feedback

A total of (5) concepts were explored, covering a spectrum of potential triggers: ***Note: See separate Hispanic findings***

1. *(Awareness-building): "Every year 300,000 children are poisoned…"*
2. *(Education): "It takes a paint chip the size of a nickel…"*
3. *(Home Prevention): "If you live in a older home, or are thinking about doing renovations…steps can be taken"*

4. *(Home Prevention) Alternate: "If you live in a older home, or are thinking about doing renovations… get your child tested"*
5. *(Fear tactics): " Children can suffer irreversible damage"*

- Overall, response to the concepts was consistent across all groups. While no concept was a clear winner, together they served to reveal the (4) key ingredients to a highly motivating message. The most emotional response was to the possible negative effects of lead exposure. These effects provided the greatest wake-up for Mothers, convincing them they need to "do" something immediately to safeguard their children. Realizing that lead is such an invisible/unknown threat elevated its importance to the highest level.
    - *"This is what makes me want to do something"*
    - *"That is what we need to know, otherwise we won't be scared"*
    - *"I had no idea it was so bad"*
    - *"Hearing loss? Violent behavior? Those are news to me"*

- However these negative effects were not relevant without first asserting that lead poisoning is a problem, particularly because Mothers were universally unaware that lead is still so prevalent. The fact that lead poisoning effects "300, 000 children/year" was the single most important piece of information mothers needed to hear in order to pay attention at all.
    - *"I thought lead poisoning wasn't a problem anymore, now I know differently"*
    - *"Lead poisoning is still a BIG problem"*
    - *"You really need to hear that 300,000 number first to pay attention"*

- As respondents sorted through the concepts, two additional pieces of information surfaced as motivating. The first was the notion that miniscule doses of lead (both "3 granules" and "paint chip the size of a nickel" were equally relevant articulations), could cause such serious problems. Mothers were under the misimpression that it took far larger quantities overtime to create real trouble. One respondent felt granules of "sand" was better than granules of "sugar" -- seemed worth noting.
    - *"It's incredible something so small could be so toxic"*
    - *"It's such a small amount!"*
    - *"Sugar seems wrong in this (negative) context, maybe sand?"*

- Finally, Mothers needed to know what they could *do* to protect their children from lead poisoning… the steps necessary to safeguard their homes and test their children. Many Mothers were clear that these steps should be simple and memorable, utilizing alliteration or rhyming to make the information easy to get *and* do. Again, lead "dust" needs to be explained, so that wiping toys (as a step), makes sense.
    - *"It should be quick and easy to remember"*

- *"Yeah like bam, bam, bam. Have it rhyme"*
- *"I want to test my child right now, to make sure she's OK"*
- *"Where can I take my children?"*

- One concept approach that was not as relevant was the "older home, renovations" scenario. This tended loose most women, as they lived in neither an older home, nor were they planning to renovate. We did learn that there was some interest in understanding lead risks associated with basic "home improvements" -- a much more common occurrence.
    - *"What happens if I use a drill and hang shelving? Does that cause lead dust?"*

Hispanic Moms

- Among Hispanic moms the concepts with more information were the most impactful. In general, "Concept D" was a clear winner. This concept touched their mind and heart, with easy to understand facts about the causes of lead and the idea that "there is hope". It also had a strong call to action: "Call our hot line".

- In general, the messaging needs to take a step back for Hispanic moms and answer the preliminary question of "What is lead?". The following key points parallel the General Market moms: What does it cause? Where is it? What can I do?

Concept A:

- For some moms, this concept "assumed" that they knew something about lead positioning. A few mentioned this was somewhat limited to children, that it is something that really affects the entire family.

- The idea that lead poisoning can affect anyone (it is something that does not discriminate) was strong,

- There is power in numbers. Although one more wanted the statement to clarify that the number was in the U.S., 300,000 was a grabber.

Concept B:

- It was shocking to discover how little it takes to be affected. Strong call to action.

- The idea of what a parent could do to prevent lead poisoning was empowering. Although when compared to Concept C, it was preferred to use the example of sugar grains.

- *"It tells you what you can do… you don't feel too lost"*
- *"I like that it makes you aware about the paint, something we can tedn to ignore"*

Concept C:

- Hispanic moms found this concept lacking information and limited to only those that are remodeling, a message that other moms could ignore. Also, it lacks more education about lead in general.
    - *"I'm not doing a remodeling, so it doesn't talk to me"*
    - *An old home is a home that is about 10 yrs old.*

Concept D:

- The strongest of all concepts, this idea communicated the key information Hispanic moms are looking for: was it lead – a poison, what it causes – irreversible damage, what can I do – avoid it, how-call. It is shocking, but relevant and important.
    - *"It grabs you… you want to know what you need to do to prevent this"*
    - *"The idea that it is 'avoidable' gives you some kind of hope… you are not lost"*

Concept E:

- Tells you what you can do to prevent it. It makes you feel that you have some power, a chance to help your child.
    - *"I'm not doing a remodeling, so it doesn't talk to me"*
    - *An old home is a home that is about 10 yrs old.*

IV. Spreading the Word

- Many Moms, **both General Market and Hispanic,** felt that the lead problem needed to be elevated to TV news, both local and national, and consistently/comprehensively covered in all the other online/printed materials they encounter at doctor's offices, schools, community groups… Many sources were names:
    - "Doctor's offices and websites"
    - "School offices and websites"
    - "Yahoo"
    - "Baby Center"
    - "Web MD"
    - "General contractors and architects newsletters"

- "CNN"
- "Local news channels"
- "PSA"
- **"What to expect when you're expecting.com"**
- **Parents.com**
- **Print / Magazines: American Baby Ser Padres, Nuevos Padres, Parenting**

VI. Conclusions & Recommendations

- Awareness of lead poisoning – both its causes and effects, **and how they can protect their family** – is little to none. There is great need for an awareness-building campaign around the continuing threat of lead poisoning. Many potential partners exist that can help carry the message… from doctors/school nurses, to health/baby websites, to community/Moms groups newsletters.

- The most impactful call-to-action was the many, disastrous effects of lead poisoning. Mothers become extremely engaged and concerned once they knew what lead could do to their children, and they would do what was necessary to protect them. Many Mothers expressed outrage (in Philadelphia mostly) that their doctors did not test their child as part of their yearly check-up.

- Pre-natal doctor visits are an opportunity time to introduce the idea of testing for, and abating, lead. Moms-to-be are already highly engaged in their/their children's heath and safety at this time, often taking on "home preparation" projects with greater zeal, in order to make the home "baby-ready." Lead abatement could be one of those projects.

- The concepts proved **among General Market and Hispanic moms,** that there was a handful of ingredients that could drive a more relevant and motivating message:
  - 300,000 children suffer lead poisoning every year
  - Lead poisoning leads to learning disabilities, loss of IQ, hearing loss, mental retardation, violent behaviors and death
  - All it takes is 3 granules, or a chip the size of a nickel to make a whole home toxic
  - Keep babies safe with simple steps
  - **It can be avoidable**
  - **There is a hotline ready to help**

- The recommended steps to protect children from lead poisoning, need to be easy and memorable. Look to the "Skin Cancer Awareness Campaign in Australia, Slip-Slop-Slap," for an example of a kid/adult-friendly, behavior-changing, public health campaign that required multiple steps. Also, it is important to remember that wiping toys is not relevant unless lead "dust" is explained.
    - http://en.wikipedia.org/wiki/Slip-Slop-Slap

Hispanic Mom Specific:

- Take a small step back and begin by simply educating "what is lead", without assuming the target has heard about it.

- Communicate in a simple, direct and emotional manner. It is a situation that affects "your family", not just the children. Hispanics in general have more of a "we" attitude to community.

- Consider communicating the facts, but without making it too "number overwhelming". Aim at a more personal message, as statistics was not a strong driver in general.

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Enclosure 2:

See reference to this enclosed document in Footnote No. 7 of RfC 10002:

Lead Poisoning Creative Research, Topline Report, Ted Manager, November 19, 2009.

LEAD POISONING CREATIVE RESEARCH
TOPLINE REPORT
11.19.09

BACKGROUND
Although many Americans think lead poisoning isn't an issue anymore (lead paint was banned in 1978), it remains a serious problem. The CDC estimates that every year 300,000 children in the US are poisoned by lead and millions more are at risk. To raise awareness and encourage those at risk to take action, the Ad Council has asked Merkley + Partners to developed a public service campaigns for the Coalition to End Childhood Lead Poisoning.

Two campaign ideas, "Pour" and "Cracks" were tested qualitatively among mothers of young children and expecting mothers. A total of six 90 minute focus groups were conducted in Philadelphia and Chicago; 4 with native English speaks and two in Spanish.

OBJECTIVE
The objective of the research is to understand which of the two recommended campaigns, "Pour" and "Cracks" is most effective in raising awareness and motivating parents, caregivers and pregnant women to take action to protect their children from lead poisoning.

SUMMARY
Both campaigns were salient, relevant and motivating. Both raise awareness and force reconsideration of the issue. However, "Pour" was more effective at prompting action, primarily because it was a quicker read and a broader message. "Cracks" was also motivating but the message was less about general awareness and more focused on the specific dangers and symptoms of lead poisoning. Both campaigns could benefit from more explanatory copy and more explicit call to actions (website and 800#).

"POUR"
"Pour" was found to be iconic and powerful, with high stopping power. The message, that lead paint is still a problem, was clear and motivating. It caused respondents who came into the group thinking that lead was no longer a problem or not a problem for them, to reconsider the issue.

The campaign's strength lies in its visual power, which makes it a quick read ("I don't have to think about it") and far less dependent on TV than "Cracks". The emotional power ("that's deep" said one respondent) is rooted in the juxtaposition of symbols of children which are "innocent", "pure", and "vulnerable" contrasted with the paint which symbolized, toxins and harm). And because there were no people/interiors, respondents were all able to relate to the message.

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The copy was also widely praised for its straightforward tone and factual details ("since 1978" and "3 granules"), although some felt more symptom specific information could help. No one, spontaneously, or when probed, thought it was about new paint. Executions that featured kid-associated visuals (milk and Cheerios) did better than ice cream (which could be for everyone). As one respondent put it, "Cheerios and milk are healthy, good for you, ice cream, although I love it, is not".

Respondent reactions:
"I don't usually stop and read (print ads) but I'd stop and read this."
"That was deep"
"Wow, this is really powerful"
"It made me very uncomfortable but in a good (take action) way"
"It made me really nervous and definitely gave me the chills – see look it gave me the chills!"
"With the milk, cheerios and ice cream – it was immediate. I know that a kid would ingest or breathe it – which is powerful"
"I kind of thought I was safe...now I would check into it I think."

"Cracks"
Although more confusing ("is it for child abuse"), the "Cracks" campaign was successful in highlighting the symptoms, which were new news and highly motivating, especially the more severe symptoms like brain damage. Overall the consumer takeaway was more about the severity of the (possible) symptoms , than awareness of the issue.

"Cracks" seemed to suffer from a level of finish issue, as many respondents weren't sure if the cracks were paint or handwriting, especially in print. Once respondents saw the TV, they rated the print much higher than on it's own. However it was still rated less motivating than "Pour" in every group but one.

The strength of the idea led in the specificity not only of the symptoms, but also, how paint could be a problem. If "Pour" was about lead paint, "Cracks" was about lead paint in your home and how it could be released. Some appreciated the "upscale" visuals, which communicated a sense that lead could be a problem for all income levels. However, others felt the upscale interior didn't relate to them ("my baby doesn't have her own room" and many more were confused (especially in *Violent Behavior*) about exactly what was causing the harm (is it her toys, the crib etc.) and the disconnect between the image and the words ("she doesn't look violent".)

Respondent reactions:

"Brain damage is a huge red flag – for parents. I would think this is a really good commercial"

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"I would definitely look this up after seeing this ad"
"This made me think that this issue could happen to anyone, not just if you live in a poverty stricken area"
"Those are some really serious and scary side effects"
"The nursery doesn't reflect my life. My kid doesn't have his own room!"
"The commercial was more informative than the print for me"
"Too creepy and dark"
"Convulsions kind of took me to child abuse"

other findings

Respondents suggested a wide variety of media to reach them including:

- Prime TV
- Parenting magazines and sites
- Doctor's office
- OOH (transit)
- Celebrity gossip magazines
- Oprah (TV and print)
- Children's programming (cartoons etc.)
- Cooking shows (esp. for "Pour")
- Home renovation shows (esp. for "Cracks")
- Email and ISP home pages
- Sports ("men can be educated too")

Of the URLs tested, leadfreekids.org was the favorite, followed by gettheleadout and finally leadout .org (which could be for anything).

conclusions

Based on this research, while both are good options, I would recomend "Pour". Pour is a quicker read, has a broader message and is more motivating than Cracks. "Pour does a better job raising awareness of the issue of lead poisoning while Cracks does a better job raising awareness of the symptoms of lead poisoning." The visual power of Pour is hard to escape, whereas Cracks gives the viewer more chance to disengage (that room doesn't look like mine) or misinterpret (is that about child abuse). And although both campaigns used fear to motivate "Pour" was described more as "scary in a good way", while "Cracks" was seen as darker and "creepy". Additional executions (i.e. replacing *Ice Cream* with *Sippy Cups* or *Juice Pops*) and optimized copy would likely further strengthen the campaign.

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Enclosure 3:

See reference to this enclosed document in Footnote No. 8 of RfC 10002:

Lead Poisoning Prevention Copy Test – Message Comprehension, Ad Council and Coalition to End Childhood Lead Poisoning, June 28, 2010.

Lead Poisoning Prevention
Copy Test – Message Comprehension

June 28, 2010

Key Findings

Key Findings: Message Comprehension

- **The majority of respondents understood that the main message of the PSAs was about the dangers to children posed by lead paint in the home.**
  - 80% of respondents listed the harmful effects of lead paint exposure or the harmful effects specifically to children as the main message of the ads.
  - 33% say the main message is that lead paint is present in homes built before 1978.
  - Very few respondents (2%) mentioned cereal or milk as part of the message.

Key Findings: Message Ratings

- **Respondents overwhelmingly said that the ads were clear, believable, relevant, and motivating.**
  - 95% of respondents agreed completely or somewhat that the ad was clear.
  - 95% of respondents agreed completely or somewhat that the ad was believable.
  - 75% of respondents agreed completely or somewhat that the ad was relevant.
  - 87% of respondents agreed completely or somewhat that the ad was motivating.
  - Few (16%) thought the ad was confusing.

Key Findings: Scare Tactics

- A significant majority of respondents (74%) said that the ad was scary.
- Similarly, 65% of respondents thought the ads were depressing.
- However, when asked why they found the ads scary, most (65%) said they were afraid about the potential risk to their children, suggesting that the ads create a sense of urgency among parents.
- Indeed 81% of respondents indicated that the ads made them want to visit a website to learn more.

Background

Research Objectives

- In April 2010, the Ad Council, the Coalition to End Childhood Lead Poisoning, EPA, and HUD launched a national public service communications campaign that encourages parents with young children and pregnant women, who live in homes built before 1978, to learn more information about the dangers of lead paint poisoning and discover steps to protect their children from its irreversible effects.

- Shortly after launch, a copy test was fielded in order to help gauge comprehension of the PSA's main message.

Methodology

What?	**Lead Poisoning Prevention Copy Test**
When?	• June 11 - 23, 2010
Who?	• National sample: 200 parents of children 0-6. • 50% living in homes built pre-1980 • 50% living in homes built post-1980 • Respondents surveyed in the recently completely benchmark study were excluded.
Where?	• Nationwide
How?	• Online survey fielded by Lightspeed Research. Respondents are members of Lightspeed's large national opt-in panel, which has access to more than 2 million members of U.S. households.

Sample Demographics

N = 200

Age	%	HH Income	%	Urbanicity	%
18-34	52 %	<$30K	30 %	City	32 %
35-54	46 %	$30-49K	24 %	Suburbs	52 %
55+	4 %	>$50K	47 %	Other	17 %
Gender		**Education**	**%**	**Age of Children***	**%**
Male	42 %	High School incomplete	2 %	0 – 3 years	45 %
Female	59 %	High School graduate	33 %	3-6 years	55 %
Race/Ethnicity		Some coll/Associate's Degree	31 %		
White	69 %	College degree +	35 %		
Black/African-American	13 %	**House built in:**	**%**		
Hispanic	12 %	1970s or earlier	50 %		
Other	6 %	1980 or later	50 %		

Note: totals might exceed 100% due to rounding

Findings

Message Comprehension

- **The majority of respondents understood that the main message of the PSAs was about the dangers to children posed by lead paint in the home.**
  - Very few respondents (2%) mentioned cereal or milk as the main message.

Main Message	%	N
Lead paint is harmful to kids	56 %	112
Lead/Lead paint is harmful/bad	24 %	72
Lead paint is present in houses built prior to 1978	33 %	66
Urge you to test for lead in your home/prevent lead poisoning	12 %	24
Violent behavior	3 %	6
Call # or Visit the website for more information	3 %	5

Q: What was the main idea of the ad? Please be specific
**Note: totals might exceed 100% due to single responses being coded into multiple categories*

Thoughts & Feelings

- **When asked what was going through their minds when watching the ads, respondents had a wide array of initial thoughts, primarily expressing concern about the problem.**
  - 5 % or less mentioned “feeling good,” “bad,” “scared,” “shocked,” or “upset”

Thoughts while watching the ad	%	N
I thought it was a milk/cereal/baby formula ad	23%	46
Made me concerned/want to test my house	10%	19
Shocked/Disturbed	10%	19
Glad/relieved that my house is not that old/would not be affected/does not affect me	9%	17
Makes me concerned for my child/makes me want to test my child	8%	15
Sad	7%	14
Got my Attention	7%	13

Q: What, if anything, was going through your mind as you watched this ad? How did it make you feel? Please be as specific and detailed as possible.

Message Ratings

- More than 9 in 10 respondents said they thought the ads tell you something important, are clear, believable, appropriate, and unique.

The ad.....	Does not describe the ad at all	Describes it somewhat	Describes the ad completely	TOP 2 BOX
Tells you something important	6%	18 %	77%	**95%**
Is clear	5%	23%	72%	**95%**
Is believable	6%	27%	68%	**95%**
Is appropriate for the issue	8%	26%	67%	**93%**
Is unique	8%	31%	62%	**93%**
Is an ad you would tell other people about	15%	37%	49%	**86%**
Is motivating	14%	39%	48%	**87%**
Is an ad you liked	15%	42%	44%	**86%**
Tells me something new	20%	38%	43%	**81%**
Is relevant to you	26%	36%	39%	**75%**
Makes you want to visit the website	20%	42%	39%	**81%**

Q: The following is a series of statements that could be used to describe the ad. For each statement, please indicate if it describes the ad not at all, somewhat, or completely.

Message Ratings

- Few respondents (16%) said that the ads were confusing.
- Many parents (74%) agreed somewhat or completely that the ads were scary.

The ad.....	Does not describe the ad at all	Describes it somewhat	Describes the ad completely	TOP 2 BOX
Is scary	27%	36%	38%	**74%**
Is depressing	36%	46%	19%	**65%**
Is offensive	82%	13%	6%	**19%**
Is confusing	85%	13%	2%	**16%**

Q: The following is a series of statements that could be used to describe the ad. For each statement, please indicate if it describes the ad not at all, somewhat, or completely.

Reasons for fear

- Of the 38% of respondents who agreed *completely* that the ad was scary, most said that they felt that way because the ad made them worry about their children potentially being poisoned.

Reasons why some respondents found the ad to be "scary"	%	N
The dangers to my children posed by lead poisoning are scary	62%	45
Lead poisoning is a scary issue	15%	11
Alarmed to know that my home – built before 1978 – could harbor dangerous lead paint	12%	9
Disturbing	5	4
Scary to see paint juxtaposed with baby bottle	5	4

Q: Why did you think the ad was confusing?

Message Retention

- 80% of respondents agreed somewhat or completely that the ad made them realize the potential dangers to their children posed by old lead paint.

The ad.....	Strongly Disagree	Somewhat Disagree	Neither agree nor disagree	Somewhat agree	Completely Agree	Top 2 Box
Made me realize the potential dangers to my children posed by old lead paint.	2 %	2 %	17 %	23 %	57 %	**80 %**

Q: How much do you agree or disagree with the following statement:

Selected Verbatims

- "Just knowing there are over 1 million children affected by lead poisoning each year is scary, because who would have thought that this was still an issue when we are now in a day and age where lead is taken out of most paint products."
- "The idea of living in a home where your children could be at risk of lead poisoning...it's more eye opening than scary."
- "I've seen the effects that toxins, such as lead poisoning, can do to a child's growing brain and how unaware most parents are to where these dangers lurk."
- "I didn't realize my home could be harming my child."

Conclusions

- **The message is clear.**
  - Both ads ("Milk Bottle" and "Cereal Bowl") communicate equally well and there were no major differences between parents living in newer and older homes.
  - This suggests that the PSAs will be relevant to and educate all parents, regardless of the age of their house, or which PSA they may view.

- **Some viewers initially thought the ads were for a cereal or milk product – but it's clear from the main message responses that they understood the lead poisoning message clearly once the ad finished playing.**

- **Those respondents who found the ad "scary" did so because of the inherently frightening nature of lead paint poisoning, and the possibility of it affecting their child.**