## Appendix K: Public Comments and Comments from Consultants Received

Sonia Kim, PhD

DNPAO, CDC

## Review of USDA OMB FFVP Evaluation Study materials

## Goals of the project:

- There are currently 2 stated goals of the project: assess impact and implementation.
- Suggestion: add a $3^{\text {rd }}$ goal: determine the reach or coverage of the FFVP.
o Rationale
- The Background section implies that lower-income students are a priority for the program; therefore it is important to know how well this target population is actually being reached.
- This information is especially relevant considering the large increases in funding that will occur by 2012 and that the number of students served by the FFVP will most likely increase as well.
- Additionally, states will most likely be interested in this information.
o Method
- Using the State Child Nutrition Agency Survey, collect the following information: (some or all of this information is already asked)
- Total number of eligible schools
- Of the eligible schools how many apply
- Of the eligible schools that apply, how many receive funding
- Since the Implementation sample will be nationally representative, would these numbers be nationally representative as well?
- The states will be interested in their own data and would find it useful to do state-by-state comparisons also. Thus, could this data also be collected from all 54 state agencies?


## Samples

- Will the implementation and impact data be representative at the state level for the 16 State Agencies and/or 54 State Agencies?
- It would be useful to be able to link this FFVP data collected to CDC's youth behavior data, such as YRBSS and School Health Profiles that are collected by the Division of Adolescent and School Health (DASH) (http://www.cdc.gov/healthyYouth/profiles/); (http://www.cdc.gov/HealthyYouth/yrbs/index.htm)
- For the Impact study: I understood that eligible schools that participated in FFVP will be compared will other eligible schools that did participate. Is this correct?
- "State Cutoff"
- The definition of this phrase is not clear. On pg. 17 "The FFVP legislation and FNS regulations require States to give FFVP funding to the poorest schools, as measured by the percent of students eligible for free and reduced price school lunches. RD estimates the causal impact of the FFVP by comparing schools directly above and below the cut-off for funding."
- This implies that the "State Cutoff" is a demarcation for eligibility. Thus comparing schools on either side of the cutoff implies that one group is eligible, while the other is not.
- Does FNS have an eligibility cut-off? Does the State Cutoff refer to a specific criteria set by the state? I.e. by FNS standards the schools could be considered eligible, but by the state's standards they are not eligible? OR because there is a narrow free/reduced price window, comparing above and below the cutoff results in the comparison of very similar schools (even though technically one group is eligible and one is not)? This distinction should be made more clear.
- The definition of "State Cutoff" should be made clearer in the diagram on pg. 19.


## Impact data

- Nutritional status
- On pg. 4, it states that the impact study will look at children's nutritional status. Is this information being collected?
- Willingness to try new fruits and vegetables
- This is an important part of attitudes. There is one question about it (pg. 8, q 16 of the self-administered survey). Other questions could be added for more depth on this issue. (Alice Ammerman of UNC has done work on this topic.)
- Increased fruit and vegetable consumption
- Pg. 8 states that the information will be used to determine whether "...the FFVP increased fruit and vegetable consumption..."
- Is there a pre/post design?
- If not, it is more appropriate to say that the data will be used to determine if students at FFVP schools have higher fruit and vegetable consumption than students at nonparticipating schools.


# Review of Evaluation Plan: Evaluation of the Fresh Fruit and Vegetable Program <br> Laura C. Leviton and Punam Ohri-Vachaspati The Robert Wood Johnson Foundation September 16, 2009 

Thank you for the opportunity to review and comment on this evaluation proposal. This is an important program, very much in line with the needs of our own organization to enable the prevention of childhood obesity. We have some general comments on the aims and design, and then we would like to turn our attention to the measurement and data collection issues, where we have most of our suggestions for improvement.

## General Comments on the Aims and Design

The aims of the study are clear and the proposed design, the use of regression discontinuity, is excellent. The OMB Clearance Package is correct that this is a design that is as rigorous as a randomized experiment under the conditions described in the evaluation plan. A great many tests and comparisons of the two methods have been conducted, especially in the school environment. The use of schools as the unit of assignment is intelligent and appropriate, and the proposed hierarchical analysis is also highly appropriate. The proposed data collection of a larger group of schools, to assess implementation is also important and appropriate.

We have three major concerns and suggestions. Two of them concern measurement and data collection, and one is analytic. We address the specifics of measurement in the next section. In summary the two concerns are:

1. The need to assure comparability of measures with existing high quality surveys, specifically SNDA III and the Bridging the Gap surveys of school policies and implementation. Both these groups have studied food access, availability and consumption issues affecting school children. Also consult the NCI Measures of Food Environment website (https://riskfactor.cancer.gov/mfe) - a compilation of studies investigating community-level measures of the food environment, including school food environment. This will allow for use of tested measures that have been and are being used for tracking changes in perceptions, behaviors, physical environments, and policies in the school food setting.

Because the proposed surveys will be conducted only once, we desperately want and need a basis of comparison. This is in line with the stated aims of NIH and CDC to develop common measures of policy and environmental factors contributing to the epidemic of childhood obesity. In general, we will want a basis of comparison and a context to interpret the results obtained. It would be sheer folly not to have comparability where feasible. This does not duplicate efforts in any sense, if that needs to be explained to OMB; the purpose of the study remains the same and the data collection is indispensable to do what needs to be done.

The instruments for school administrators and food service clearly borrowed extensively from SNDA III; however, Abt Associates should take a fresh look at the content of SNDA III in any case and contact the developers at Mathematica.

We urge them to employ questions that are comparable to the Bridging the Gap survey. This is an annual survey of a representative sample of 500 to 700 school districts and schools (elementary, middle and secondary). The surveys can be found at
http://www.monitoringthefuture.org/ and/or
http://www.impacteen.org/aboutus.htm or by contacting the principal investigators:

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1. The problems of response rate, missing data, and age inappropriate questions. The finest design in the world cannot overcome problems that limit the accuracy of data collection. Impairing the accuracy of data will, in turn, guarantee a no effect conclusion. Error in measurement introduces noise in that which we want to analyze. Unfortunately, with the current instruments and data collection plan, the evaluation is certainly headed toward a no-effect conclusion. We realize Abt is not permitted to pilot test the instruments before OMB approval, but really, given the experience to date in surveying school administrators, this is worrisome.
a. The instruments for administrators are unnecessarily awkward to use, impose a large response burden where it is not necessary, and will therefore impair both response rate and accuracy. It is a fundamental principle of survey research that increased response burden will increase error and missing data. See details below.
b. Response rate for administrators will be a serious problem even if the surveys are made more user friendly. The incentives described will not be sufficient to guarantee the response rate that Abt is targeting, based on our recent experience using the web to collect data from school
personnel. There was no description in the OMB package of how Abt proposes to ensure the response rate they need. In any revision, it will be important for USDA to know in detail, how Abt plans to follow up with administrators and food service personnel to get them to respond. There should be a specific and ample line item in their budget for labor to convert non-
respondents into respondents. The data collection component is the biggest budget item for any evaluation project such as this, and it is the one area that a low bid on the RFP will impair the most. It will be important to make sure that labor is assigned to the specific task of assuring the necessary response rate.
c. The instruments for children are not age appropriate and there are better instruments available for both the family surveys and 24 hour recalls. Fourth and fifth graders will not be able to respond to some of these issues in the formats provided.
2. Greater analytic attention, and data collection where possible, to consumption of less nutritious foods. The entire rationale for the program rests on the assumption that increased fruit and vegetable consumption will lead to decreased consumption of less nutritious foods. The background section lists other causal relationships (e.g. cancer incidence) as purely secondary to the epidemic of childhood obesity. The rationale is in the legislation as described page 3. Yet the analytic plan has a fatal flaw. There is no direct evidence that increasing $F \& V$ consumption in children will cause decreased consumption of calorie dense foods of limited nutritional value. Yet increasingly there is evidence (e.g. Gortmaker and Wang, Sturm) that we will only prevent childhood obesity by decreasing the consumption of calorie dense food of limited nutritional value.

Yet the data collection and analytic plan do not pay sufficient attention to this issue. The 24 recalls will yield some of the information, but the self-administered student instrument should address this in depth-see Exhibit A-2, $7^{\text {th }}$ page. Regardless of decisions about the self-administered instrument, analytic questions about this issue, as seen on $7^{\text {th }}$ page of Exhibit A-2, should take higher priority! Unlike data collection, adding another analysis costs very little, and could tell us so much.

## Specific Suggestions on the Aims and Design

1. The statement of aims for the program is very clear on page 2 of the OMB Clearance Package. However, the introductory statement under Background, page 1, is not. The program is about so much more than teaching healthier eating habits, and in fact this statement is misleading. We would urge you to take another look at the expanded statement on page 2 to restate the first sentence under Background, page 1.
2. On page 3, first full paragraph, it is important to estimate the number of children served by the program, and if possible, the numbers at each stage of program expansion.
3. On page 6, in smaller districts the school food authorities may be the same individuals as the school food managers. How will this be addressed? Remember response burden!
4. On page 7, if there is enough variation in nutrition education then analysis examining the dose of nutrition education on outcome variables. This could be addressed on Exhibit A-2, second to last page.
5. In Exhibit A-2 Topic area 2, another question worth considering would be "how are the FV presented - whole vs cut-up vs other creative ways? Does acceptability vary by what is offered, how, and where for different age, gender, and ethnic groups?"
6. On the last page of Exhibit A-2, what about examining changes in NSLP based on consumption of F\&V after participation in FFVP? From dietary recalls, can be easily analyzed.

## General Comments on the Instruments:

1. Given the length of the school administrator surveys, all instruments should be reviewed with regard to their utility in addressing specific research questions. Some suggestions on simplifying and cutting back the survey are included under specific surveys.
2. The self administered survey and the food diary for $4^{\text {th }}-6^{\text {th }}$ graders included in the package seem quite advanced and beyond the reading and comprehension levels of many $4^{\text {th }}$ and $5^{\text {th }}$ grade students. This will make data erroneous for large portions of the respondents. Suggestions for alternate measures are provided under specific surveys.
3. Given the current debate over the role of healthy fruit and vegetable consumption vs the role of energy dense food consumption to maintain energy balance, and the fact that the legislation in place specifically requires that the program be evaluated with regard to its effect on consumption of other foods, consider adding questions on energy dense foods in children's survey.
4. Respondents for SFA's and School Food Managers may be the same individual in many small to medium school districts.

## Specific Comments:

## State Child Nutrition Agency

1. Given that the elementary schools can be different combinations of grades (k-4, k-6, k-8 etc), it would be good to know the grade levels in schools selected in the different states. Schools may choose different implementation strategies based on the age of children. This info can be obtained here, from the principal or SFA.
2. Question 5, 7-need to define what does satisfactory school wellness policy mean - is it the presence of a policy? Level of implementation? Or some type of scoring?
3. Check options for Question 9 - one date and month option for 0910 but open date and month for 10-11?
4. In question 12 give examples for options like Implementation plans, nutrition education (may want to include things like number of hours and frequency, partnerships)
5. Question 16 might consider adding promotional materials and education materials as options

## SFA Survey

2. In large school districts, SFA would have to consult with individual schools to answer some of these questions - it might be helpful to acknowledge that upfront. It also makes the time for administration longer than what is specified in the OMB package.
3. This is a large module and the response burden would be high. Also, for a number of questions, it is unlikely that the SFA would have the level of detail for individual schools that is being asked (see comments below). Might consider adding a don't know option.
4. F2 - as it reads now, you will not know if any changes took place in the prior years especially for schools that have had the program for a few years?
5. For Q M1 - please check if the schools are used to reporting average number of meals served per day or total number of meals per month - it would make it easier for them to report along the same lines for this survey. It is our experience that these individuals report average meals per day. If so, then the burden of calculating the total meals falls to the respondent-which is contrary to the principles behind paperwork reduction, and also will greatly increase the probability of an erroneous answer! For an on-line survey it should be exceedingly easy to ask the respondent how they usually report this information - then present a skip out to the format that they generally employdaily average or monthly total. Knowing the number of school days in the month, let the computer calculate the total, for those individuals that report a daily average. These and similar issues are so important to the accuracy and completeness of survey responses - it is very surprising that Abt did not address this given the size of the firm and their assumed experience. We realize they cannot pilot test the instruments, but really, given the experience to date in surveying school administrators, this is worrisome.
6. Questions M2, M2b, M2d, M2e - If the SFA is reporting for all schools in the FFVP, the changes are likely to vary from school to school - for example changes in 3-8grade schools may be quite different from changes in $k-3$ schools etc. Asking for each school may be quite cumbersome - but you will not get useful information by lumping all the schools together. Again, a skip out pattern could be used-specify each of the schools in the sample, then query the SFA as to whether changes are similar for next school in the list. If so, they can skip out to the next named school-if not, they can fill in the necessary information. This reduces response burden in a way that is consistent with web survey, but minimizes useless error.
7. It would be good to cut down on the number of items asked in $q$ M2e - not sure how useful is the bread stick category, I would also consider consolidating all types of cookies and frozen desserts - the low-fat options are still loaded with sugar.
8. Q M2e - separate soda pop and fruit drinks as categories
9. M3 - SFA may not know of all the USDA programs the school has participated in - for example, Extension staff often make contact with the school principals to set up classes for SNAP ed or EFNEP and the SFA is often not aware of it. It may be better to limit to types of USDA activities that the SFA is promoting in these schools.
10. M5 - if the school is getting the snack from the parents, food bank or a local store donation, the SFA may not be aware of it. Given the limited staffing in most SFA's, I would be surprised if they can accurately give you details on freq and timing for snacks that are not coming through them. It would be helpful if you split this question and ask the details only for those snacks that are provided through SFA and just ask about the

SFA's awareness of other types of snacks that may be offered to children.
11. $S 2$ - this is a time consuming question and I am not sure about the value of asking this question, is it addressing a specific research question? Asking for so much information might jeopardize response rate or provide unreliable data. Instead for implementation why not just ask - i. distribution method (by grade level), ii. times of day when offered, and iii. common FV offered.
12. S4 - not sure if Very Poor quality should be worded differently otherwise you may not get many people checking that category for the SFA survey.

## School Foodservice Manger

1. In some schools the person filling out the SFA form may be the same as the one filling this one. This is of concern for response burden.
2. Page 9 - may want to replace the word serving with portion - to avoid confusion with USDA servings.
3. P 11 - consider adding "I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started".

## School Principal

1. Principals may need to consult with other staff to answer these accurately - may be good to say that upfront so they are prepared. OR give don't know as an option.
2. Do you want to know if the district / school wellness policy is in place and being implemented? Either here or in SFA or both?
3. Would they count PSA's and interactive displays as nutrition education activities?
4. For N1 - have to say nutrition education or promotion activities occurred at SCHOOL during the week for at least some classes...
5. Move the statement "If you do not have access to this information check here to before the table.
6. Ref period in N1a different from reference period in N4.
7. Questions like N2c, may need a "don't know" option. Other options of interest may be Choose healthy beverages, choose healthy snacks
8. Q N2e - Add Students, Volunteers as options
9. Q N3a, N4a - add options as for N2c
10. Q N6 Change first column heading to Type of occasion / venue. Add another column in the table for "No food offered at this venue/occasion"
11. Q C2 - clarify the difference between school food service run and school run operations. Suggest following wording: Compared to the 2007-2008 school year, would you say your school now serves more, less, or about the same amount of the following types of foods in school-operated venues - those that are not run by school food service?
12. Q C2 - separate soda pop and fruit drink categories; for skim and 1\% milk address if it includes flavored milk
13. QC2 - the distinction between the first and last column headings is not clear
14. QC2 - recommend consolidating all types of cookies, chips, and ice-creams - low fat versions can still be high in calories and sugar
15. QF2 - may consider adding Farm to school as a partnership?
16. O - consider adding "I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started".

## Teacher survey

1. consider adding " I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started".

## Food Record

1. This record would be helpful in obtaining 24 hour recall from young children, however, the format; the description guide; and the volumetric and size assessment visuals seem very advanced for $4^{\text {th }}$ and $5^{\text {th }}$ graders level of comprehension and reading abilities. Use of fractions and decimals will also be beyond many $4^{\text {th }}$ and $5^{\text {th }}$ graders.
2. The researchers may want to look at the methodology used for SNDA III studies -
http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/SNDAIIIInstruments.pdf

## Self Administered Student Questionnaire

1. Many of the questions in this instrument seem much more complex and advanced than the comprehension and reading level of many $4^{\text {th }}$ and $5^{\text {th }}$ graders. These include Hispanic and Race questions, NCI Fruit and Vegetable screener; complex format for questions 12, 13d (skip patterns).
2. Will these questions ever be read to the children - reading comprehension in some schools may be a challenge.
3. Recommend looking at the SPAN survey validated for $4^{\text {th }}$ graders and also includes questions on energy dense foods http://www.sph.uth.tmc.edu/catch/catch_em/4th\ SPAN\ Eng\ v8.p df
4. Q 13 b - would be interesting to add "I do not like the fruits and vegetables that are offered" and "I do not like how the school offers fruits and vegetables, for example, are they cut up, whole, or in a bag, etc"
5. A four point scale may be more than children can discern on - a three point scale may be more appropriate.
6. This instrument needs questions that will assess dietary changes related to consumption and preferences for less nutritious, energy dense foods. See questions in SPAN survey above.

## School Food Environment Assessment

1. Section A, Q 1 - Instructions need to include the possibility that the students may already in the classroom and FV may arrive there.
2. Q 13 need to define the three options for staff attire - is it cleanliness or creativity or both
3. Q 15, 16, 18 - for good inter-rater reliability define the categories clearly - what is meant by most, some, little?
4. Section B - similar comments as in Section A.
5. For vegetables served at school lunch will fresh include - salad, cut up, steamed, stir fried? etc.
6. Page 9 - Q 17 typo - replace fruit with vegetable.
7. Page 10 - Q D1. For ease of data entry draw a line from column location to column number
8. Page 10 Q2 Juice ( $50 \%$ ) should be listed as Juice Drink . Not sure of the Water or sparkling water with juice category - isn't that same as $50 \%$ juice drink or is that something schools make and sell?
9. Consolidate low fat and regular cakes etc.

## Parent

1. Q 6 add option "did not apply"
2. Q8 - will not allow making a distinction between USDA lunches and a-la-carte or other competitive source lunches.

## Food and Nutrition Service

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- Comments:


## STATE CHILD NUTRITION AGENCY SURVEY

## A. Selection of FFVP schools

Tae following questions are ahout the application and selecton of whomis to participare m the FFVP in the 2009-2010 sehool year.
1 How did your agency solacit applations fiom selool fond , mulnomiles (SFAs) for their
 apply:

- Announcement or requests for applications on website
() E-mail or clectronic newsletter announcement to all $\mathrm{Sl}^{\circ} \mathrm{A}$ s
- Letter of inviration by mail to all SFAs
- Application materals by mail to all SFAs
 likely to be selected for the FFVP
0 Application materials provided only to SI'As slentified loy the State as likely to he selected for the FFVP
- Meenng where SFAs could learn about FFVI and get applatanom materats

0 Other (specify)
On what date was the availabolity of applicatons tor the litiVP announced?

Annuancernent date _ ................--
3 On whal date were applications tor the lilivp due?
Application due dare: $\quad / \quad / . . . .$.
4 How did SFAs apply for their schools in participate in the FIVVP? Please check all that apply:

- Paper application
- On-line application

5 What were the minimum requirements for partopating in the $\cdot[P V P$ ' Please check all that apply and fill in blanks as appropriate.
() Minimum percentage of students approved for free/reduced-price meals Specify minimum percentage: $\%$
0 Minimum number or days per week/rnonth for FFVP os he olfered Sperify mmmum bimber of days _... .. per weck/month (circle one)
() Minimum number of hours of nutrition education per weck/munth for each grade Specify minimum number of hours of nutrition culucaron Per week/month (circle one)

- Minimum number ol partners

Specify minimum number ol partuers: $\qquad$

- Minimum percentage of FFVP budget provided by partners, in catsh or m-kind

Specify minimum percentage of PFVP hudget provided hy pariners: $\qquad$

Ab) Associales, Inc
Add Quentin's strongly disagree with the following statements.


B State FFVP guidance and oversight
1.. In which of the following areas did your agency stall) fsh State-specific policies and recommended practices for the $\mathrm{IF} F \mathrm{VF}$, in addition to those established by FNS?

- Implementation plans
() Partnerships
- Farm-to-caleterta projects
- Purchasing cooperatives
- Promoting the IFFV' $o$ students and parents
- Selecting and purchasing fruits and vegetables
- Serving fruits and yegerables (distribution methods, time of day, portion sizes)
- Role of teachers in FFVP

0 Food safety

- Nutrition education and promotion in contescron with the FFVP
b) Performance and expenditure reporting

A None of the above only use FNS polices and recommended practices ISKIP

AOl Associates, ic
Stale CN Agency Survey -. Drat A/14/00

122. Please provide a copy of your State's policies or a link to the web page where they are available
0 Hard copy submitted by mail (use reply envelope provided with your survey invitation)
0 Electronic copy submitted by e-mail $\mathbb{O}$ [STUDY ADDRESS]
0 URI, for policies: http: $\qquad$ -.
13. Did your Stare provide suggested nutrition education curricula or materials for use in conjunction with the PFVP?

1) Yes
() $\mathrm{No} \mid \mathrm{SKIPTO}$ 14]

13a. Which of the following topics were included in these nutrition education curricula or materials? (Check all that apply)
0 Role of fresh fruits and vegetables in a complete died
0 Where fresh forums and vegerables come from, links io local farms.

- 'lying new foods, varese

0 Healthy and less healthy snacks
0 Cooking with fresh fruits and vegetables
0 Healthy weight and overweight

- Phyacal activity

0 Other (Please specif: $\qquad$ ..)

13h. What audiences were targeted by these nutmorn education curricula or materials"? (Check all that apply)

- Preschool and kindergarten

0 Grades 1.3
0 Grades 4-7


- Older children
- Parents

14. What monitoring and technical askance activate for the liVe have you conducted in the last 12 months"? (Check all that apply)
) In person training or conference
) Web/conference-call training
2 Periodic web meetings/conterence calls
) Scheduled site visits
) Unannounced site visits
b) Help line/assistance on-call from State agency
) Help line/assistance ont-call from partners
a) Review of financial records supporting clams

## feed back to sonnies's to ampere

 suplementatici
## C. Non-Federal partnerships

15. The FFVP encourages development of partnerships with non-federal entities. Does your State Agency have any partners for the FFVP?

3 Yes
$\rightarrow \mathrm{NO}$ (SKIP TO 16)
15a. Please check all types of partners that work wit your State Agency to carry out the FFVP.

## Produce for Better Health

Healthcare providers, including hospitals and clinics; doctors. nurses, nutritionists, dieticians/dietetic interns, or other clanicians/pabmoners

Community Health Agencies
City, County. State, or tribal government agency (o g. health department, agriculture departments, etc.)

Cooperative Extension Service
Grocers and stores, farmers' markers, or other tow a......h.........
Vocational clubs
Produce assoctations/commodiry groups.
 Associations)

Health associations (eng. State or Nathormal atilt or Heart Associations)

Universities, colleges, or other higher education


Community action agency, food bank. or other ©
Other (specify): $\qquad$
18. Which of the following types of information doe your Agency collect on a monthly basin from FFVP schools?

- Number of days that FFVP foods were offered
() Number of dias that nutrmorl education was offered as part of FFVP
- Number of students with access to IFVP

0 Operating cost broken down herweern food. labor. and supplies
0 Breakdown of food cost by category (fruits, veperathles)
0 Food purchase cost detail by item or category ( es, total spent on apple ᄅे(c.)

- Quantity purchased for each food item

0 Unit size (as purchased) and price for cash toot lem

- Detail of operating cost for labor
- Detail of operating cost for supp hes

0 Admimstrative cost broken down between labor, equipment, and other
0 Detail of administrative cost for labor

each mom os.

- Detail of admmistrative coss for equipment
- Detail of other administrative cost
- Narrative of nutrition education provided as pat of FFVP

0 Narrative of FFVP promotion activities

- Narrative of issues or challenges
- Narrative of goals met or accomplishments
- Plans or goals for next month (s)

18a. Please provide a copy of your Stare's monthly claim form and ir to the web page where they are available

- Hard copy submitted by mail (use reply envelope provided with y invitation)
- Electronic copy submitted by e-mail to [STU D)Y ADDRESS]
$\bigcirc$ URL for claim form and instructions: hep: $\qquad$

19. What is the maximum amount of FFVP grant fund thar your State could 1, 2009 and June 30, 2010 tor State administration, bathed on the FNS rules?

象 $\qquad$ limit for July 1, 2009-June 30, 2010

19a. What does this figure represent?
$05 \%$ of the grant

- Salary alone for lull-rime coordinator (SKIP $\mathrm{T}^{\circ}$ ) 190)

0 Salary plus fringe benefits for full-time cons donator
0 Other (Please specify: .. .)

F4. Please enter the requested IFFVP application statistics for period specified above.


15. Please indicate whether you strongly agree. agree, nether agree nor disagree, disagree. or sirongly disagree with the following staternents regarding the ITVP application process for SY 2010-2011.


## ITHIS QULSTION ONLY FOR THE 16 STATES WITH SAMPLE SCF

F6. Please provide copies of the FFVI claims for July 2009 through J following schools:
[I.IS'T ALL FFVP SCIIOOLS IN SAAMPLE]
We prefer to receive these data in electronic form, or in a computer printe cliams include anformation that is not in the electuone syatem, such as na need coppies of the actual clams. You can provide clectronic or paper cor

Elactronic data may be sent by e-mal mo [STUDY EMAII. ADDRRESS]. data by secure file transfer, send a reçuest to the srudy slaff by c-mail.

Paper copies of reports or claim forms may be submilled in the prepaid FedEx envelope provided io you.


## School Food Environment Assessment

Date: $\qquad$ Time: $\qquad$ Observer Initials:
School ID\#: $\qquad$

5. Overall serving/eating environment:
[.] Exceptional
Pleasant (clean, cheerful, inviting)

Acceptable (clean. well-muintuined, but sparse)

Unpleasant (dirty, dingy, or in need of maintenance)
6. Nutrition promotion materials/education present? (check all that apply)
[] Nutrition posters \#: $\qquad$ $\square$ Taste testing
[.] Nutrition displays \#: $\qquad$
$\square$ Staff encouraging student Staff providing education Phachuts Tackers.
7. Record any other observations about the serving or eating environment (s).


|  <br>  |  |  |  |
| :---: | :---: | :---: | :---: |
| Mist each fruit/vegetable | Whole/Sliced/Halved/Peeled Sectioned/Mashed/Pureed | Mode of Presentation/Packaging (i.e. plates/utensils, pre-packaged) | $\begin{gathered} \text { Appeal } \\ +, 0 .- \end{gathered}$ |
|  |  |  |  |
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NOTE WITH $\Lambda^{"+}$ " ANY OF THE ABOVE ITEMS T"HAT ARE UNUSUALLY APPEALING, WITH A "„"ANY ITEMS THAT ARE UNAPPEALING, WITH " 0 " look fine but not especially appealing.
9. Dofthc fresh fruit look fresh, crisp, ripe and otherwise in good condition? (not wilted, brown, truised, or over-ripe)

10. Do the fresh vegetables look fresh, crisp, ripe and otherwisc in good condition? (not wilted, brown, bruised, or over-ripe)
$\square$ Most or all $\square$ Some $\square$ Almost none or none $\square$ Not served
11. Is any other type of food or condiment served with the FFVP?
$\square$ No
$\square$ Dip (Describe:
$\square$ Other (Describe:
$\qquad$
$\qquad$
12. Record any other observations about the fruits or vegetables served.
13. Describe the overall staff attire:
$\square$ Exceptional

Nothing notable (plain and cle:an)
Some areas of concern

19. Pick up a copy of the current FFVP menu. Note any differences with actual foods served and any substitutions.
$\square$ No difference
menu wax monthlyDifferent fruit offered (write in substitution:
$\square$ Different vegetable offered (write in substitution:

20. Anything notable about student behaviors, attitudes or response to the FV being served?
$\qquad$
$\qquad$ School (DOH: $\qquad$
I would like to ask you some questions about the foods at your school. Most of the questions are to help us when we are describing the foods recorded by students on their food diaries. This interview should take about l5-20 minutes to complete. Before we begin, can I first get a copy of the lunch, breakfast and if intervention school, fresh fruit and vegetable program (FFVP) menus for yesterday/today/tomorrow?
A. Bout Interviewee


1. What is your current position?School foodservice manager District foodservice managerOther $\qquad$ Ale mantas
2. About how long have you been at this position at this school? $\qquad$ years

Your school provides fresh fruits and vegetables to students as free shacks - separate from school meals. I would like to ask you some questions specifically about this program.

1. Reference FFVP day: (corresponding to student food diary)Today $\square$ $\square_{2}$ Yesterday
2. What is the typical length of each daily FFVP period? (mark N/A if not offered other periods)
a. $\qquad$ minutes for period 1

Grades served: $\qquad$
b. $\qquad$ minutes for period 2

Grades served: $\qquad$
c. $\qquad$ minutes for period 3

Grades served: $\qquad$
d. $\qquad$ minutes for period 4

Grades served: $\qquad$
3. What is the maximum and minimum number of servings of fruit a student can take a part of FFVP?
a. Maximum \# of servings:
b. Minimum \# of servings:
$\square$ 1 One $\square$ Z Zero
$\square$ 2 Two
$\square$ 3 Unlimited
$\square$ 2 One
$\square$ $\square_{3}$ Two
un peckages

4. What are the maximum and minimum numbers of servings of vegetables a student can take as part of FFVP?
a. Maximum \# of servings:
b. Minimum \# of servings:
$\square 1$ OneZ Zero2 Two $\square$ $\square_{2}$ One
$\square$ 3 Two
un packages in paper bowl
mosryten delivered in Sadi
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will read a series of statements about your school's fresh fruit and vegetable program. For each tent, decide if you agree or disagree and then whether you strongly or somewhat agree or agree. There are no right or wrong answers.

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W I have just a few final questions to ask about your school's fresh fruit and vegetable program.
23. Overall, how satisfied are you with the fresh fruit and vegetable snack program?
24. If you could change one thing about the fresh fruit and vegetable snack program, what would it be?
25. Since the fresh fruit and vegetable program started at your school, have you changed the portion size of fresh fruits and vegetables offered in the program?
a) (If yes to above) How has portion size changed? (check all that apply)
b) (If yes to above) Why did you change the portion size?
26. Which 3 fresh fruits do students like best in the program? (write in)
27. Which 3 fresh fruits students like least in the program? (write in)
28. Which 3 fresh vegetables students like best in the program? (write in)
29. Which 3 vegetables students like least in the
30. During this current school year, has the fresh fruit and-vegetatole-program been promoted by foodservice staff J
?
a) posters or displays
b) fliers sent home
c) taste tests
d) nutrition education classes/instruction
e) verbal encouragement when snacks are distributed
f) loudspeaker announcements g) other (write in)
31. For each strategy marked i $30-36$ ask) How often during this current schoolyear has foodservice staff promoted the fresh fruit and vegetable program using
a) posters or displays
b) fliers sent home
c) taste tests
d) nutrition education classes/instruction
e) verbal encouragement when snacks are distributed
f) loudspeaker announcements
g) other (write in)
Fl. In what school year did your district first participate in the FFVP?


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> M2．We are interested in hearing about changes in the types of foods offered over the past severa］years in the following schools．
［LIST FFVP SAMPLE SCHOOLS．］



## Program since the 2007-2008 school year? <br> 



 M2b. Compared to the 2007-2008 school year, would you say you now serve more, less, or about the same amount of the

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 Lunch Program since the 2007-2008 school year? M2c_ii. Have you changed the overall wariety of fruits and vegetables served to students through the National School

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schools: [LIST SAMPLE SCHOOLS]. Please include lists of specific foods purchased for the FFVP during these months. Please send copies of the FFVP reimbursement claims for [REFERENCE MONTH AND TWO PRIOR MONTHS] for the following
MATERIALS FOR RETURNING COPIES TO BE SENT WITH LETTER INVITING SEA TO COMPLETE SURVEY] XI. CLAIM REQUEST. [THIS WILL BE ASKED IF STATE DOES NOT HAVE FOOD ITEM DETAIL FOR FFVP CLAIMS.



 кчון parow
Nutrition Education
[INSERT INTRODUCTION ON PURPOSE OF SURVEY, TO BE TAJLORED FOR FFVP SCHOOLS, NON-FFVP SCHOOLS]
SCHOOL PRINCIPALS SURVEY FOR FFYP EVALUATFON (8-14-2009 DRAFT)


N2c. What message(s) were conveyed by the nutrition education or promotion activity? Please check all that apply. duration for different grade levels, please report the average amount of time tor each class.
aEat a variety of foods
oEat more fruits and vegetables

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\begin{aligned}
& \text { םEat lower fat foods more ofler } \\
& \text { aBe physically active }
\end{aligned}
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 mouy 1 inogo 800Z-L00Z u! se uequ ssoja oMore than in 2007-2008
aSame as in 2007-2008
fess than, or about the same as in the 2007-2008 school year?
oMore than in 2007-2008
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ring the 2009-2010 school year, is the a


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group have input on？Please check all that apply． NTa．Which of the following types of meals，snacks，and other food offerings does this parenticommunity adwisoryjpolicy

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ce. Please include sales from vending machines, snack bars, and other school-operated venues. You may need to consult with
one who oversees these venues to answer this question. (Check one response for each food.)
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| 1. | $\begin{array}{l}\text { The students in my school like to eat the fruit and } \\ \text { vegetable snacks offered at school. }\end{array}$ |
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whether you agree or disagree O. Finally, we would like to ask you about your opinions of the Fresh Fruit and Vegetable Program. For each statement, please tell us


## NASS Comments

OMB Docket for the Food and Nutrition Service: Evaluation of the Fresh Fruit and Vegetables Program
The OMB package for the Food and Nutrition Service's evaluation of the Fresh Fruit and Vegetable Program (FFVP) was prepared by Abt Associates, who designed and will also administer the multiple surveys comprising the complex evaluation. The package is comprehensive, and generally wellpresented, but there is a notable omission: no questionnaire was included for any of the component surveys; appendices C through I are blank. Although Appendix A contains a helpful overview of the planned data collection, outlining outcome measures and planned analyses (Exhibit A-2), we could not specifically review question sets for the Survey of State Child Nutrition Agencies (C), the Survey of School Food Authorities (D), the Survey of School Principals (E), the School Food Environment Assessment (F), the School Food Service Manager Interview (G), the Teacher Survey (H), or the Student Self-Administered Questionnaire (I). Within the text of the document, item A. 8 understandably contains blanks (since the Federal Register's announcement of the impending evaluation had not appeared at the time the version of the docket sent to us was completed).

The surveys constituting the FFVP evaluation fall into two groups: those targeting the impact of the program on the participating schools and their students (impact study), and those focusing on the implementation of the program (implementation study). The main feature of the impact study is a survey based on a regression discontinuity design covering elementary schools in 16 states (with selection of thirteen states by region--two from the Northeast, three from the Midwest, six from the South, and two from the West-- based on PPS sampling where the measure of size is the number of elementary school students attending schools where at least 50 percent of the students participate in the National Free or Reduced Lunch Program (FRLP), and including California, Florida, and Texas as certainty states). Within the selected states, sample elementary schools are selected by a PPS scheme, some slightly above their state's cutoff for the Fresh Fruit and Vegetable Program, hence eligible and participating in the program, and some slightly below their state's cut-off , hence not participating in the program. FFVP eligibility criteria vary by state-only elementary schools may participate, and those schools with the highest percentages of low income students for their states have the highest priority for inclusion. The total school sample for all 16 states was designed to contain 128 responding FFVP-participating schools, scoring above the state-specific FFVP cut-offs, and 128 responding schools falling slightly below them (and not participating). Within the selected schools, one classroom will be randomly selected from the fourth, one from the fifth, and one from the sixth grades represented in the school, and within each of the three classrooms selected, ten students will be drawn into a stratified cluster sample, along with their teacher. An $80 \%$ response rate is posited, yielding a 24 -student sample per school. These students will be trained to complete a 24 -hour food diary for one specific day, with the assistance of a caregiver; they will also be interviewed by a survey specialist on their food consumption and nutritional attitudes, on the diary due-date, the day after the diary date. Because FFVP-eligibility scores of the surveyed schools, whether they are program participants or not, are similar within their state, all falling close to the state cut-off , program participation can be considered random within this population, regression equations can be run, and outcomes for the FFVP-participating students may be attributed to their program participation, once allowance is made for demographic and "school-environmental" covariates in the regression equation. SAS Proc SurveyReg will be used to account for the sample design in the development of regression equations, but the possible regression models have not been specifically described (possibilities are
sketched out in Exhibit A-2) Carrying out the impact survey plan and obtaining valid data requires official input on state FFVP cutoffs, on schools applying for the program, with school demographics, school environmental characteristics, and precise school scores obtained on the poverty characteristic used to test for eligibility within the sample state. Abt plans to obtain these data from the state Child Nutrition Agencies (CNAs) for each state included in the surveys. Through an additional web survey, Abt plans to obtain further data on the FFVP from School Food Authorities (those entities legally responsible for administering the FFVP and other federal school programs, at school district level) to have their assessment of the FFVP, details of the program administration, foods offered, any FFVP-related changes in the School Breakfast Program or the National School Lunch Program. Additional validating data on the FFVP food items served, their scheduling and venues, will be obtained through a short interview with Food Service Managers at the selected schools. There are also visits by trained observers checking the physical environment of the FFVP schools, the set-up and conditions for distribution of the FFVP fruits and vegetables, and the presentation of nutritional information in the schools, completing the School Food Environment Assessment cited in Attachment F. The teachers of the students in sample contribute their own data through a short, self-administered survey, distributed with the student diary forms, and the principals of the sampled schools are asked to complete a web survey on their school's FFVP.

Note that the three main subsidiary surveys--of CNAs, School Food Authorities, and Principals-contributing to the impact study also supply data for the implementation study, intended to provide national estimates of program implementation procedures by FFVP-participating schools. The regression study, with its small sample of schools all selected close to the state cut-off scores for program participation, cannot be generalized to the whole set of FFVP schools. For the implementation study, in addition to the 128 FFVP-participating schools included in the regression sample, an additional 560 participating schools will be included, with the goal of providing at least 448 additional FFVPparticipating (and responding) schools (yielding a total of 576 FFVP schools), assuming an $80 \%$ response rate at school level. Sampling details for the additional 560 schools are not given (the documentation does state that, for generalizability, all FFVP schools in the continental U.S. will have a positive selection probability). It is clear from the description and Appendix A that sampling stops at school level for this survey. Analysis to be performed for the implementation study is not described in detail; estimates are to be descriptive in nature, "consisting primarily of proportions." According to Appendix A, the school-level data on FFVP implementation will be obtained from the three subsidiary surveys feeding the regression study, which will be extended to include the additional 560 FFVP schools selected and all 54 state Child Nutrition Agencies. The surveys involved are all internet surveys, and web-based surveys are known to have particular unit nonresponse issues; whole unit response rates for these three (including the state CNA survey) may easily sink below $80 \%$, according to Don Dillman. Item nonresponse is also highly probable, and will have to be dealt with.

From B. 3 in the packet, it is clear that considerable thought has been given to maximizing response and gaining student and school support for the impact study. The importance of gaining the support of the state agencies is acknowledged. Certain measures have been taken toward these goals: schools and students will receive modest incentives for their participation; a study liaison will be designated to visit the classrooms and deliver study packets, and reminder letters will be provided to be sent home to caregivers whose child's food diary isn't turned in on the due date. It should also be noted that some preliminary testing has been carried out: student/parent/teacher/food service manager parts of the impact
survey were pretested by an Abt associate in two California elementary schools, in a small test involving nine students, their parents, two teachers and a food service manager (the method of selection is not stated). In a follow-up session, some difficulties were noted, suggestions were made for improving these instruments, and certain questions were revised. However, the California pretest may not be conclusive: it is no easy task for ten to twelve-year-olds in schools with high poverty rates to provide reliable, informative survey data, even with the assistance of caregivers-and it is not clear that they will be able to do so. In any case, more information is needed. The questionnaires should be included in the packet, because question sequence and skip patterns for the surveys influence response patterns. Obtaining complete, valid data from CNAs and School Food Authorities is particularly crucial to the success of the project.

Evaluation of the Food and Nutrition Service's Fresh Fruit and Vegetable Program: Additional Materials
Additional documentation for the Evaluation of the Food and Nutrition Service's Fresh Fruit and Vegetables Program (FFVP) by Abt Associates includes seven questionnaires from the surveys associated with the program, and the text of the food environment assessment carried out separately by trained observers, as well as revised versions of Parts A and B of the docket, with further details on the pretesting phase of the program. The children's survey and food diary, the survey of parents, and the teachers' survey seem unproblematic. The Children's Food Diary, illustrated and provided with measuring tools, appears to be easy for the preteens to interpret and complete, mitigating some concerns about nonresponse from elementary school students participating in the survey. The teachers' and parents' surveys also seem readable and easy to follow. One suggestion: since the evaluation includes schools with fairly high proportions of low income students in Pacific coast and Southwestern states, it could be very helpful--and beneficial for the Fresh Fruit and Vegetables Program--to provide a Spanish translation of the parents’ survey (costs may be prohibitive). The School Principal's Survey, web-based, with different branches for principals of FFVP-participating schools and those whose schools are not in the program, appears well-designed and should be an effective instrument for data gathering.

The following are our suggestions for the State Child Nutrition Agency survey, the School Food Authorities' (SFA) survey, and the survey of food service managers. The web-based survey of State Child Nutrition Agencies requires an intensive data-gathering effort from respondents, which could result in considerable item nonresponse. In Section D, collecting and reporting of various expense items from FFVP Schools, a URL needs to be provided for the agency's claim form and instructions. In Section F, the detailed listing of FFVP expenses for the period from July 1, 2009 through June 30, 2010, should not be visible to respondents before the fall of 2010. Could it be cited in the State Child Nutrition Agency survey and transmitted separately at a later date? In Section C, "Non-Federal Partnerships," question 17.b needs a link, "name" probably, as in the school principals' questionnaire, to tie the partnerships from 17.a to one of the columns of functions listed for them in 17.b. Since in the tabular presentation of 17.b, there are only four partner columns, the last sentence of the text of $17 . \mathrm{b}$ should read, "An additional sheet is provided...if you have more than $\mathbf{4}$ major partners" [Not " 5 ", a carry-over from the school principals' questionnaire where the corresponding item had five columns ]. For clarity, the 17.b partnership types could be qualified as "major type of partner" in the opening sentence as well. It might be simpler for respondents to have the "four additional partners" item follow 17.b directly, instead of placing it at the
end of the questionnaire (this may be an automated skip pattern already built into the web survey). Respondents of the School Food Authorities’ survey (also web-based) have an intensive data-gathering task as well—requiring SFA director co-operation, school district-level data, and finally, school-level data for one FFVP-participating school, and one non-FFVP school in the SFA's district. To cite an example from the FFVP school-related section, it may not be realistic to ask these respondents to attempt to gauge the popularity of each fruit or vegetable item served during the elementary school reference week (a task better suited to the food service managers, who are surveyed separately by personal interview, or to teachers, who are in direct contact with their students on a daily basis). Finally, in surveying the food service managers, interviewers should avoid survey terminology and use common English for effective communication with their target respondents. Thus for question 1, I would suggest, "For what day did the students list their school lunch in their food diaries?" (with no mention of "survey reference" days).
FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVIISION |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Issue | Item | Reviewer | Comments | FNS | Abt |
| Outside Reviewer Comments |  |  |  |  |  |
| Goals of the Project |  | Sonia Kim (CDC) | There are currently 2 stated goals of the project: assess impact and implementation. Suggestion: add a 3rd goal: determine the reach or coverage of the FFVP. Rationale: 1) The Background section implies that lower-income students are a priority for the program; therefore it is important to know how well this target population is actually being reached. 2) This information is especially relevant considering the large increases in funding that will occur by 2012 and that the number of students served by the FFVP will most likely increase as well. 3) Additionally, states will most likely be interested in this information. | Yes - May require an additional data collection survey | Basic data will be collected to address this objective. See below. See also Memo 10/21/09 |
|  |  | Sonia Kim (CDC) | Method for adding a 3rd goal: Using the State Child Nutrition Agency Survey, collect the following information: (some or all of this information is already asked) <br> - Total number of eligible schools <br> - Of the eligible schools how many apply <br> - Of the eligible schools that apply, how many receive funding <br> -Since the Implementation sample will be nationally representative, would these numbers be nationally representative as well? <br> -The states will be interested in their own data and would find it useful to do state-by-state comparisons also. Thus, could this data also be collected from all 54 state agencies? | Yes--Will need information on all FFVP schools to find out frp\%, number of days per week operating, intensity, and average cost per serving. | Data on eligible schools, how many apply, and how many are funded will be collected from all 54 states to provide national totals without sampling error. Number of days per week will be collected from the nationally representative sample of SFAs. Cost data will permit calculation of cost per child per serving day. Number of servings is not tracked and would not be feasible to collect. |
| Samples |  | Sonia Kim (CDC) | Will the implementation and impact data be representative at the state level for the 16 State Agencies and/or 54 State Agencies? |  | State survey data will be collected from all 54 State agencies. Implementation data will be collected from a nationally representative samale of X SFAs |
|  |  | Sonia Kim (CDC) | It would be useful to be able to link this FFVP data collected to CDC's youth behavior data, such as YRBSS and School Health Profiles that are collected by the Division of Adolescent and School Health (DASH) (http://www.cdc.gov/healthyYouth/profiles/); (http://www.cdc.gov/HealthyYouth/yrbs/index.htm) |  | The food frequency questions on the selfadministered student questionnaire are adapted from the frequency instrument from the YRBS, and may be used to compare descriptive information about reported frequency of fruit and vegetable consumption in our sampled students to YRBS summary statistics. Similarly, questions about foods for sale in schools in the SFA and school principal surveys used food categories adapted from the categories used in the School Health Profiles, and may be compared similarly in some cases. |
|  |  | Sonia Kim <br> (CDC) | For the Impact study: I understood that eligible schools that participated in FFVP will be compared will other eligible schools that did participate. Is this correct? |  | Clarified in OMB package |
|  |  | $\begin{aligned} & \text { Joe } \\ & \text { Thompson } \\ & \text { (RWJF) } \end{aligned}$ (RWJF) | Recompeting of schools will pose a major problem. | Yes | The study will be representative of schools selected for and participating in SY 2009-2010. Prior participation will be identified. |




## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Lorelei DiSogra (UFPA) | Dose response is critical; how are you going to deal with schools who offer fruits and vegetables infrequently? Also, want to capture doses given in the past and current. | Yes | See memorandum on dose response analysis. |
| Appendix A. Overview of Data Collection and Analysis | Exhibit A-2 <br> Topic Area 2 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | In Exhibit A-2 Topic area 2, another question worth considering would be how are the FV presented - whole vs cut-up vs other creative ways? Does acceptability vary by what is offered, how, and where for different age, gender, and ethnic groups? | Yes | Form in which FFV are served captured by Environment Assessment observations; analysis will relate this to participation and satisfaction measures as appropriate. However, note that inference from this analysis will necessarily be correlational, not causal; schools that spend significant time and effort on FV presentation may differ in unobservable ways from schools that do not. |
|  | Exhibit A-2 <br> (last page) | Laura <br> Leviton and Punam Ohri- <br> Vachaspati (RWJF) | On the last page of Exhibit A-2, what about examining changes in NSLP based on consumption of F\&V after participation in FFVP? From dietary recalls, can be easily analyzed. | Yes- need to make sure that student participation in NSLP and SBP on the same day as EEVID | Will have information on student receipt of NSLP lunch. Will examine differences in counts of NSLP lunches between FFVP and non-FFVP schools. Can consider further exploration if large differences in counts. |
| DRAFT OMB PACKAGE |  |  |  |  |  |
| DATA COLLECTION INSTRUMENTS |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
| General Comments |  | Laura <br> Leviton and Punam Ohri- <br> Vachaspati (RWJF) | Given the length of the school administrator surveys, all instruments should be reviewed with regard to their utility in addressing specific research questions. Some suggestions on simplifying and cutting back the survey are included under specific surveys. | Yes | Instruments have been simplified to reduce burden. This issue will be revisited after the pretest. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | The self administered survey and the food diary for $4^{\text {th }}-6^{\text {th }}$ graders included in the package seem quite advanced and beyond the reading and comprehension levels of many $4^{\text {th }}$ and $5^{\text {th }}$ grade students. This will make data erroneous for large portions of the respondents. Suggestions for alternate measures are provided under specific surveys. |  | See memo addressing this issue. Methods have been successfully used in long term large scale NIH studies. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Given the current debate over the role of healthy fruit and vegetable consumption vs the role of energy dense food consumption to maintain energy balance, and the fact that the legislation in place specifically requires that the program be evaluated with regard to its effect on consumption of other foods, consider adding questions on energy dense foods in children's survey. |  | Analysis of 24-hour recall will provide information on consumption of energy dense foods. Questions on frequency of consumption of energy dense foods added to student questionnaire to improve estimates of usual |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)



## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | Q6 | Laura Leviton and Punam OhriVachaspati (RWJF) | Q 6 add option "did not apply" |  | Left as is, but added question about whether child eats FFVP snacks |
|  | Q8 | Laura Leviton and Punam OhriVachaspati (RWJF) | Q8 - will not allow making a distinction between USDA lunches and a-la-carte or other competitive source lunches. |  | Comment does not seem applicable to questions |

SCHOOL ENVIRONMENT ASSESSMENT

| Outside Reviewer Comments |  |  |  |  |  |
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|  | Section A, Q1 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Section A, Q 1 - Instructions need to include the possibility that the students may already in the classroom and FV may arrive there. | Yes | DONE |
|  | Q13 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Q 13 need to define the three options for staff attire - is it cleanliness or creativity or both | Yes | DONE |
|  | Q15, 16, 18 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Q 15, 16, 18 - for good inter-rater reliability define the categories clearly - what is meant by most, some, little? | Yes | DONE |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | Section B | Laura Leviton and Punam OhriVachaspati (RWJF) | Section B - similar comments as in Section A. | Yes | DONE |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | For vegetables served at school lunch will fresh include - salad, cut up, steamed, stir fried? etc. |  | FRESH will be defined in trainings to include no processing except for cutting, slicing (e.g., yes to green salad, no to steamed) |
|  | pg. 9, Q17 | Laura Leviton and Punam OhriVachaspati (RWJF) | Page 9 - Q 17 typo - replace fruit with vegetable. |  | DONE |
|  | pg. 10, QD1 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Page 10 - Q D1. For ease of data entry draw a line from column location to column number |  | DONE |
|  | pg. 10 Q2 | Laura Leviton and Punam OhriVachaspati (RWJF) | Page 10 Q2 Juice (50\%) should be listed as Juice Drink . Not sure of the Water or sparkling water with juice category - isn't that same as $50 \%$ juice drink or is that something schools make and sell? |  | 50\% juice may be available in schools so left as separate item |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Consolidate low fat and regular cakes etc. |  | We decided not to consolidate low fat and regular cakes, etc because of nutritional differences between them; we will however train data collectors to ask about this if they are unable to tell based on looking at the product |
|  |  | Lorelei DiSogra (UFPA) | Expand to collect other data- need to go broader, it is too brief and has potential to get more information since a live person is there. | Yes | Unclear what additional information is required; Did add some questions but must also be mindful of time needed to collect additional data |
|  | Q1 | Lorelei DiSogra (UFPA) | This can vary, need to clarify---be more specific on what to expect and what photographs you want. | Yes | Will include in instructions to data collector |
|  | Q6 | Lorelei DiSogra (UFPA) | Staff needs to be specified i.e.- teacher, principals, etc.. | Yes | DONE |
|  | Q19 | Lorelei DiSogra (UFPA) | Get monthly FFVP menus | Yes | DONE |
|  | Title of Survey | CDC/DASH | Are you interested in type of payment system used? | No | NO, not relevant to aims to know about for other school foods \& FFVP is free |
|  | pg. 11, D1 | CDC/DASH | Number of what? A la care locations? Students served? Individual vending machines? Vending machine locations? |  | DONE |
|  | pg. 12, D2 | CDC/DASH | "Energy and sports drinks..." It would be more meaningful to have these items listed separately. |  | Left as is because distinction is not relevant in elementary school settings. |
| SCHOOL FOODSERVICE MANAGER INTERVIEW |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | In some schools the person filling out the SFA form may be the same as the one filling this one. This is of concern for response burden. |  | Instruments are designed with minimal overlap between SFA and school food manager questions. School food manager instrument will only be used in impact sample schools; data collectors will be instructed to skip overlapping questions that have been answered as part of the SFA questionnaire. |


| FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL) |  |  |  |  |  |
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| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | pg. 9 | Laura Leviton and Punam OhriVachaspati (RWJF) | Page 9 - may want to replace the word serving with portion - to avoid confusion with USDA servings. |  | DONE |
|  | pg. 11 | Laura Leviton and Punam OhriVachaspati (RWJF) | P 11 - consider adding "I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started". |  | DONE |
|  |  | Lorelei DiSogra (UFPA) | Ask fo rmonthly FFVP menu- menus for all months |  | DONE |
|  | pg. 9 | Lorelei DiSogra (UFPA) | Add to instructions "as part of the FFVP" after "separate from school meals" |  | DONE |
|  | pg. 9, Q2 | Lorelei DiSogra (UFPA) | Most often delivered to classroom for students to pick up on way out to recess. |  | DONE |
|  | $\begin{aligned} & \text { pg. 9, Q3 and } \\ & 4 \end{aligned}$ | Lorelei DiSogra (UFPA) | "servings" - clarify in packages, in paper bowls, etc... |  | DONE |
|  | pg. 10 | Lorelei DiSogra (UFPA) | I think the students benefit from the FFVP. The Fresh F\&V students receive in the FFVP may be the only fresh $f \& v$ they eat. | FNS noted comment | DONE |
|  |  | Lorelei DiSogra (UFPA) | Other questions to consider: Has the FFVP influenced what frut and/or vegetable you serve in school lunch? Has the FFVP resulted in studenst taking/eating more fruits and/or vegetables in school lunch? | Yes | DONE |
|  | Q23 | Lorelei DiSogra (UFPA) | Same as Q21 |  | DONE |
|  | Q24 | Lorelei DiSogra (UFPA) | Same as Q22 |  | DONE |
|  | Q24 | CDC/DASH | Same as Q22 |  | DONE |


| FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL) |  |  |  |  |  |
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| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | Q29 | Lorelei <br> DiSogra <br> (UFPA) | Add "fresh" before "vegetables" |  | DONE |
|  | Q30 | Lorelei DiSogra (UFPA) | "Foodservice staff"--what about other school officials: principals, teachers, nurse...? |  | Left as is, because school foodservice manager likely to know best what school foodservice staff are doing; principal best to ask about what all school staff are doing. |
| TEACHER SURVEY |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | consider adding "I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started". |  | 2 questions added |
| FOOD DIARY |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | This record would be helpful in obtaining 24 hour recall from young children, however, the format; the description guide; and the volumetric and size assessment visuals seem very advanced for $4^{\mathrm{t}}$ and $5^{\text {th }}$ graders level of comprehension and reading abilities. Use of fractions and decimals will also be beyond many 4th and 5th graders. | Critical | The diary is used as a tool to raise awareness, and promote memory and accuracy in portion estimation for the 24 hr recall conducted on the second day. Children are trained in how to record, and do so relatively well. Probes are included for the parents. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | The researchers may want to look at the methodology used for SNDA III studies -http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/SNDAIII-Instruments.pdf |  | snda iii used split 24 hr recall $1 / 2$ with parents at home- requires two contacts with students. Not feasible within the design, resources of this study. |
|  | Food Description GuideSoda/Sparkli ng Water | CDC/DASH | Where to include vitamin water? |  | DONE |
| SELF-ADMINISTERED STUDENT QUESTIONNAIRE |  |  |  |  |  |
|  |  |  | Outside Reviewer Comments |  |  |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Many of the questions in this instrument seem much more complex and advanced than the comprehension and reading level of many $4^{\mathrm{h}}$ and $5^{\text {th }}$ graders. These include Hispanic and Race questions, NCI Fruit and Vegetable screener; complex format for questions 12, 13d (skip patterns). |  | See memo for responses to all commentsYRBS questions used for $F V$, and BSQ quesitons added for snacks and beverages. To only be used to cross check the estimates from 24 hr recall data, not as another source of point estimates. |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Will these questions ever be read to the children - reading comprehension in some schools may be a challenge. |  | No will be self admin, children do well with it. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Recommend looking at the SPAN survey validated for 4th graders and also includes questions on energy dense foods http://www.sph.uth.tmc.edu/catch/catch_em/4th\%20SPAN\%20Eng\%20v8.pdf |  | Spans asks about yesterday, not FFQ. 24 hr data more useful for yesterdays intake of snacks and bevs. Have used SPANS format to tailor the questionnaire to younger children. |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Q 13 b - would be interesting to add "I do not like the fruits and vegetables that are offered" and "I do not like how the school offers fruits and vegetables, for example, are they cut up, whole, or in a bag, etc" |  | Concepts captured in other questions. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | A four point scale may be more than children can discern on - a three point scale may be more appropriate. |  | Will reassess after pretest. |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | This instrument needs questions that will assess dietary changes related to consumption and preferences for less nutritious, energy dense foods. See questions in SPAN survey above. |  | Analysis of 24-hour recall data will be used to assess changes. Some questions are added to survey to improve usual estimates of energy dense food intake. |
|  | pg.5, 13a | $\begin{array}{\|l\|} \hline \text { CDC/DNPA } \\ 0 \end{array}$ | This questionnaire assumes the student knows about the FFVP. Is it reasonable to assume that students will be able to distinguish among fruits and vegetables from breakfast, lunch, vending, stores, after-school programs? |  | Will be discussed in motivational instruction session. |
|  | pg. 5, Waste | $\begin{array}{\|l\|} \hline \text { CDC/DNPA } \\ 0 \\ \hline \end{array}$ | Add "If you take the free fruit and vegetable snack, do you usually eat the whole snack? (Or do you throw some of it away.) | Define whole? | DONE |
|  | pg. 7, Q14 | CDC/DASH | Consider open-ended option for students, too...If you could change the FFVP, what change would you make? |  | DONE |
| SCHOOL PRINCIPAL SURVEY |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Principals may need to consult with other staff to answer these accurately - may be good to say that upfront so they are prepared. OR give don't know as an option. |  | Abt has added specific instructions to principals to consult with other staff when necessary to answer questions, rather than just say "don't know". Need for "don't know" as an answer option for questions will be reviewed after the pretest. |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Do you want to know if the district / school wellness policy is in place and being implemented? Either here or in SFA or both? | Yes | SFA and principal surveys include questions on most important elements of school wellness policy: foods offered in school meals, competitive foods, and nutrition education/promotion. |
|  |  | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Would they count PSA's and interactive displays as nutrition education activities? |  | As in prior FNS nutrition ed. studies, these are considered indirect education. |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | For N1 - have to say nutrition education or promotion activities occurred at SCHOOL during the week for at least some classes... |  | We considered this comment and left the question as worded. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Move the statement "If you do not have access to this information check here to before the table. |  | We considered this comment and left the question as worded. We want to encourage the principal to get the answer. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Ref period in N1a different from reference period in N4. |  | N1a combined with N1 covers 4 weeks; N4 covers all 4 weeks together. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Questions like N2c, may need a "don’t know" option. Other options of interest may be Choose healthy beverages, choose healthy snacks |  | List of messages expanded. We want to encourage the principal to get the answer. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Q N2e - Add Students, Volunteers as options |  | We considered this comment and left the question as worded. |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Q N3a, N4a - add options as for N2c |  | We considered this comment and left the question as worded. We want to encourage the principal to get the answer. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Q N6 Change first column heading to Type of occasion / venue. Add another column in the table for "No food offered at this venue/occasion" |  | Rows are defined by time, not venue, so header left as is. Column for "not applicable" covers "not applicable" |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Q C2 - clarify the difference between school food service run and school run operations. Suggest following wording: Compared to the 2007-2008 school year, would you say your school now serves more, less, or about the same amount of the following types of foods inschool-operated venues those that are not run by school food service? |  | We considered this comment and left the question as worded. If there is confusion in the pretest, we will clarify. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | Q C2 - separate soda pop and fruit drink categories; for skim and 1\% milk address if it includes flavored milk |  | Existing categories were based on a previously-validated instrument, so we did not make this change. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | QC2 - the distinction between the first and last column headings is not clear |  | Wording for colum headings has been changed to clarify intent. |

## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
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| Issue | Item | Reviewer | Comments | FNS | Abt |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | QC2 - recommend consolidating all types of cookies, chips, and ice-creams - low fat versions can still be high in calories and sugar |  | Existing categories were based on a previously-validated instrument, so we did not make this change. |
|  |  | Laura Leviton and Punam OhriVachaspati (RWJF) | QF2 - may consider adding Farm to school as a partnership? |  | Messages (N2a etc.) include "Where FFV come from". Partners include farmer's markets, produce associations/commodity groups. "Farmer's market" category intended to include local farmers; to be clarified in final version. |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | O - consider adding "I think students eat less (or more) vegetables at lunch time since FVPP started" and "I think students eat less (or more) fruit since the FVPP started". | Yes | We ask the most knowledgeable people this question: the school food service managers and the SFA director. |
|  | $\begin{aligned} & \text { pg. 3, N2c \& } \\ & \text { pg. 4, N3 } \end{aligned}$ | $\begin{aligned} & \mathrm{CDC/DNPA} \\ & 0 \end{aligned}$ | Education messages. The ones detailed in the "State Child Nutrition Agency Survey" on pg. 5, ques 13a were better and more comprehensive ("role of fresh fv in a complete diet, where fresh fv come from, trying new foods, variety, etc) |  | Education messages now match longer list of answer options from State Child Nutrition Agency Survey. |
|  | pg. 5, N7 | $\begin{aligned} & \mathrm{CDC/DNPA} \\ & 0 \end{aligned}$ | "Advisory/Policy group of parents or community members..." What if the group is comprised mainly of teachers and staff? Shouldn't this count? |  | Teachers/staff was added to the list of individuals who could make up the advisory group for this question. |
|  | pg. 1 | CDC/DASH | How long after the reference week will this survey be given? There is concern about accurate recollection of the data. |  | The reference week will be the last full school week before the week when the survey is completed. This will be specified in the instructions. |
|  | N1 | CDC/DASH | Is there a reason there is no row for afterschool? |  | Intent of the question is nutrition education conducted during school hours only, which could potentially be tied to the FFVP in FFVP schools. |


| FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL) |  |  |  |  |  |
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| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | N2d | CDC/DASH | Will principals actually know this information being asked? |  | Abt has added specific instructions to principals to consult with other staff when necessary to answer questions, rather than just say "don't know". Need for "don't know" as an answer option for questions will be reviewed after the pretest. |
|  | C2 | CDC/DASH | "Stopped offering this food after 2007-2008"--Would something in this column also qualify in the "This food not offered in 2007-2008 or now column"? Should the "or now" be deleted from the first column? |  | Wording for colum headings has been changed to clarify intent. |
|  | C2 | CDC/DASH | "Food category"--Add energy drinks as a separate item (e.g., Red Bull) |  | Abt felt it was unlikely that these drinks would be offered to elementary school students, and furthermore that respondents would not react well to being asked. Also, the existing categories were based on a previously-validated instrument, so we did not make this change. |
|  | O Q10 | CDC/DASH | Consider adding this item to the other surveys (parent, foodservice manager, etc) |  | See above. |
|  | pg. 1 | Lorelei DiSogra (UFPA) | Don't think survey should start w/ tedious questions on nutrition education. Start with overarching questions about success. | Yes | First section of survey is questions to be answered by all principals. Objective, descriptive data are the primary objective of the survey. Satisfaction questions have been left at the end of the survey, since it is Abt's feeling that questions about the program's success should best be asked after the principal has been prompted in the rest of the survey to think through various aspects of the FFVP and related programs at the school. Opinion questions are easier to answer and therefore good to place at the end after respondent has answered harder questions. Introduction and recruiting materials will motivate respondents; placing opion questions at the end will encourage respondents to "stick with it". |



FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | Q. 05 | Lorelei <br> DiSogra <br> (UFPA) | Add question (not legible) | FNS will ask Lorelai |  |
|  |  | $\begin{array}{\|l\|} \hline \text { Lorelei } \\ \text { DiSogra } \\ \text { (UFPA) } \\ \hline \end{array}$ | Need to understand the role of principal--they know about impact on kids, family, parents, schools, teachers. |  | Principal questions are within scope of what we expect to be usual knowledge. |
| SFA SURVEY |  |  |  |  |  |
| Outside Reviewer Comments |  |  |  |  |  |
|  |  | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | In large school districts, SFA would have to consult with individual schools to answer some of these questions - it might be helpful to acknowledge that upfront. It also makes the time for administratio longer than what is specified in the OMB package. |  | Abt has added specific instructions to SFA survey to consult with other staff when necessary to answer questions, rather than just say "don't know". Need for "don't know" as an answer option for questions will be reviewed after the pretest. |
|  |  | Laura <br> Leviton and Punam Ohri- <br> Vachaspati (RWJF) | This is a large module and the response burden would be high. Also, for a number of questions, it is unlikely that the SFA would have the level of detail for individual schools that is being asked (see comments below). Might consider adding a don't know option. |  | Abt has worked to streamline and reorganize the instrument overall in order to address burden concerns. Need for "don't know" as an answer option for questions will be reviewed after the pretest. |
|  | F2 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | F2 - as it reads now, you will not know if any changes took place in the prior years especially for schools that have had the program for a few years? |  | This is true. Survey is focused on current year. Asking about prior years would add burden. |
|  | M1 | Laura <br> Leviton and Punam Ohri- <br> Vachaspati (RWJF) | For Q M1 - please check if the schools are used to reporting average number of meals served per das or total number of meals per month - it would make it easier for them to report along the same lines for this survey. It is our experience that these individuals report average meals per day. If so, then the burden of calculating the total meals falls to the respondent-which is contrary to the principles behind paperwork reduction, and also will greatly increase the probability of an erroneous answer! For an on-line survey it should be exceedingly easy to ask the respondent how they usually report thi information - then present a skip out to the format that they generally employ-daily average or monthly total. Knowing the number of school days in the month, let the computer calculate the total for those individuals that report a daily average. These and similar issues are so important to the accuracy and completeness of survey responses - it is very surprising that Abt did not address this given the size of the firm and their assumed experience. We realize they cannot pilot test the instruments, but really, given the experience to date in surveying school administrators, this is worris |  | Our experience is based on reporting requirements. School meal counts are rolled up to monthly basis for claims. Question is asked of SFA where claims are prepared. This is consistent with prior studies for FNS such as School Lunch and Breakfast Cost Study. |


| FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | M2 | Laura Leviton and Punam OhriVachaspati (RWJF) | Questions M2, M2b, M2d, M2e - If the SFA is reporting for all schools in the FFVP, the changes are likely to vary from school to school - for example changes in 3-8grade schools may be quite different from changes in k-3 schools etc. Asking for each school may be quite cumbersome - but you will not get useful information by lumping all the schools together. Again, a skip out pattern could be used-specify each of the schools in the sample, then query the SFA as to whether changes are similar for next school in the list. If so, they can skip out to the next named school-if not, they can fill in the necessary information. This reduces response burden in a way that is consistent with web survey, but minimizes useless error. |  | Questions moved to school-specific module. |
|  | M2e | Laura Leviton and Punam OhriVachaspati (RWJF) | It would be good to cut down on the number of items asked in q M2e - not sure how useful is the bread stick category, I would also consider consolidating all types of cookies and frozen desserts the low-fat options are still loaded with sugar. |  | Existing categories were based on a previously-validated instrument, so we did not make this change. |
|  | M2e | Laura Leviton and Punam OhriVachaspati (RWJF) | Q M2e - separate soda pop and fruit drinks as categories |  | Existing categories were based on a previously-validated instrument, so we did not make this change. |
|  | M3 | Laura Leviton and Punam OhriVachaspati (RWJF) | M3 - SFA may not know of all the USDA programs the school has participated in - for example, Extension staff often make contact with the school principals to set up classes for SNAP ed or EFNEP and the SFA is often not aware of it. It may be better to limit to types of USDA activities that the SFA is promoting in these schools. |  | Programs specified are the ones of most interest. Principal survey will pick up school level partnerships with EFNEP/CES. |
|  | M5 | Laura Leviton and Punam OhriVachaspati (RWJF) | M5 - if the school is getting the snack from the parents, food bank or a local store donation, the SFA may not be aware of it. Given the limited staffing in most SFA's, I would be surprised if they can accurately give you details on freq and timing for snacks that are not coming through them. It would be helpful if you split this question and ask the details only for those snacks that are provided through SFA and just ask about the SFA's awareness of other types of snacks that may be offered to children. |  | Question moved to school-specific module. SFA encouraged to contact school if needed to complete this module. Will revisit whether principal response needed after pretest. |


| FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL) |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | S2 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | S2 - this is a time consuming question and I am not sure about the value of asking this question, is it addressing a specific research question? Asking for so much information might jeopardize response rate or provide unreliable data. Instead for implementation why not just ask - i. distribution method (by grade level), ii. times of day when offered, and iii. common FV offered. |  | We are trying to reconstruct the menu for the week and link foods to grades served. We have simplified so that we ask for the list of FFV offered by all distribution methods in the two time periods. We will revisit this after we get information from the pretest on the burden. |
|  | S4 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | S4 - not sure if Very Poor quality should be worded differently otherwise you may not get many people checking that category for the SFA survey. |  | We will revise if needed based on pretest feedback. |
|  | pg. 2 | $\begin{aligned} & \text { CDC/DNPA } \\ & 0 \end{aligned}$ | Add "Source of fruits and vegetables" | What can be done to get at local sources fro produce...i.e. locally grown? | This question is primarily intended to give us a sense of quantifiable changes in FFVP implementation over time (e.g., more or less distribution methods, more or less nutrition education activities.) Changes in source could be along several dimensions; a separate question would be needed to sort this out. The RFP did not contain any research questions relating to sources of fruits and vegetables. For these reasons, and because of burden considerations, we did not add this. |
|  | pg. 3 | $\begin{aligned} & \mathrm{CDC/DNPA} \\ & \mathrm{o} \end{aligned}$ | Separate "Local grocers and stores" from "Farmers' markets" and "other food distributors." [This question was asked on other surveys as well, e.g. "School principals survey."] |  | Abt has made this change. |
|  | pg. 18 | CDC/DASH | Please clarify what "per class" means |  | Intent is to capture the average time that an individual student has access to FFV. Will clarify if needed after pretest. |




## FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)

| DRAFT OMB PACKAGE |  |  |  | REVISION |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Issue | Item | Reviewer | Comments | FNS | Abt |
|  | Q5-7 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Question 5, 7 - need to define what does satisfactory school wellness policy mean - is it the presence of a policy? Level of implementation? Or some type of scoring? |  | State defines what is satisfactory. Asking for this definition would increase burden. |
|  | Q9 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | Check options for Question 9 - one date and month option for 09-10 but open date and month for $10-$ 11? |  | Corrected. |
|  | Q12 | Laura <br> Leviton and <br> Punam <br> Ohri- <br> Vachaspati <br> (RWJF) | In question 12 give examples for options like Implementation plans, nutrition education (may want te include things like number of hours and frequency, partnerships) |  | We will revise if needed based on pretest feedback. |
|  | Q16 | Laura <br> Leviton and Punam OhriVachaspati (RWJF) | Question 16 might consider adding promotional materials and education materials as options |  | We will revise if needed based on pretest feedback. |
|  | pg. 9 | $\begin{array}{\|l\|} \hline \text { CDC/DNPA } \\ 0 \end{array}$ | Also ask if the following is being collected from FFVP schools: requests/problems/needs from the school related to FFVP (e.g. for training, supplies, change in State policies). | Yes | Added (now Q18) |
|  | pg. 10 | $\begin{array}{\|l\|} \hline \text { CDC/DNPA } \\ 0 \end{array}$ | The salary for a full-time FFVP coordinator in the State was asked, but not if there is a full-time FFVP coordinator in the State. If not, who is in charge of administering the program, and what \% of time does this represent? |  | Revised per FNS comment |
|  | pg. 11 | $\begin{array}{\|l\|} \hline \text { CDC/DNPA } \\ 0 \end{array}$ | Add training and education expenses here. |  | Do not expect states to report this separately; if applicable will be identified as component of admin expense |
|  | B. 12 | CDC/DASH | Any difference between farm-to-café and farm-to-school? |  | Both terms used (now q14) |



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TO: Tracy Palmer, FNS, USDA
FROM: Karen Webb, Lorrene Ritchie and Pat Crawford


DATE: October 16, 2009
RE: FNS re age appropriateness of student questionnaire and diary assisted 24 hr recall

The purpose of this memorandum is to respond to reviewers' comments about the age appropriateness of the student diary and the student questionnaire. The following information may be useful in understanding and placing confidence in the diary assisted recall method and the student questionnaire. Small modifications have been made to the student questionnaire to address one of the reviewer's comments as described below.

We understand that a food diary and a prompt list may appear to be difficult for 4th-6th graders. However, the method in this context is used as a tool to assist a full 24 hr recall interview on the following day. The basis for the diary assist was a diary protocol developed, piloted, and validated in the multisite NHLBI Growth and Health Study. This study is the largest longitudinal study with low income African American and White children's diet with 2,379 children measured at baseline and annually for the next ten years. The superiority of this method was demonstrated in a validation study comparing food diaries, 24 hr recall and food frequency in 9 and 10 year old low income children (Crawford et al., 1994). There are many publications based on these data (see reference list). A script for student training and practice session, and a detailed protocol and coding manual for administration of the diary and the modified multiple pass 24 hr recall will be used to train and oversee data collectors and coders. The investigators have extensive experience in using these forms of dietary assessment in large scale studies.

It appears that the comments about the age inappropriateness of the self administered student questionnaire related mostly to the use of YRBS questions on frequency of consumption of fruit and vegetables. We included food frequency questions as a cross check on the usual intakes of fruits and vegetables, in comparison to that reported on the 24 hr data. The reason for selecting YRBS questions is their widespread use, and previous validity testing, albeit in adolescents and not among elementary school children. However, we could find no questionnaire with validated questions on fruit and vegetable intakes, so we retained these questions in the student questionnaire and will specifically assess children's understanding of the questions in the pilot.

Reviewers suggested we include questions about frequency of snacks and beverages, which we can do as a check on how they compare with estimates we obtain from the 1-day diary assisted
recalls. Again, we could find no questions about these which had been validity tested in the age group of interest. However we did find such a questionnaire for older children, the BSQ, and we have selected questions from that questionnaire and included them in our revised student questionnaire. We improved the layout and the look of our questionnaire and included pictures along the lines of the SPANS questionnaire recommended by Laura Leviton, and we will pilot our revised questionnaire to assess understanding of content with low income 4th-6th graders. It is notable that all tools identified, including the SPANS questionnaire ask about food intake "yesterday." The diary assisted 24 hr recall will capture food intakes more accurately than a short questionnaire. While it may be possible to develop a simple food frequency questionnaire for elementary aged children for use in this study, it would have unknown validity, so we have chosen to supplement our dietary data with selected YRBS and BSQ questions, both of which have been validity tested with diverse, albeit older youth.

## Selected references using food diary method in elementary aged children from the NHLBI Growth and Health Study:

1. Crawford PB, Obarzanek E, Morrison J, Sabry ZI. Comparative advantage of 3-day food records over 24-hour recall and 5-day food frequency validated by observation of 9- and 10-year-old girls. J. Am. Diet. Assoc., 94:626-630, 1994.
2. Crawford PB, Obarzanek E, Schreiber GB, Barrier P, Goldman S, Frederick MM, Sabry ZI. The effects of race, household income and parental education on nutrient intakes of 9- and 10-year-old girls: NHLBI Growth and Health Study. Annals of Epidemiology 5(5):360-368, 1995. 3. McNutt SW, Hu Y, Schreiber GB, Crawford PB, Obarzanek E, and Mellin L. A longitudinal study of dietary practices of black and white girls 9 and 10 years old at enrollment: The NHLBI Growth and Health Study. J. Adol. Health, 20:27-37, 1997.
3. Striegel-Moore R, Morrison JA, Schreiber G, Schumann BC, Crawford PB, Obarzanek E. Emotion induced eating and sucrose intake in children: The NHLBI Growth and Health Study. Intl. J. of Eating Disorders. 25:389-398, 1999.
4. Wang MC, Crawford PB, Moore EC, Hudes M, Sabry ZI, Marcus R, Bachrach LR. Influence of adolescent diet on quantitative ultrasound measurements of the calcaneus in young women. Osteoporosis International. 9:532-535, 1999.
5. Ritchie LD, Spector P, Stevens MJ, Schmidt MM, Schreiber GB, Striegel-Moore RH Wang, Crawford PB. Dietary patterns in adolescence are related to adiposity in young adulthood: An analysis of data from the longitudinal NHLBI Growth and Health Study of Black and White females. J Nutr 2007;137:399-406.
6. Striegel-Moore RH, Thompson D, Affenito SG, Franko DL, Obarzanek E, Barton BA, Schreiber GB, Daniels SR, Schmidt M, Crawford PB. Correlates of beverage intake in adolescent girls: the National Heart, Lung, and Blood Institute Growth and Health Study. J Pediatr. 2006 Feb;148(2):183-7.

## Validation of the BSQ, the Beverage and Snack Questionnaire:

Development and Validation of a Beverage and Snack Questionnaire for Use in Evaluation of School Nutrition Policies Marian L. Neuhouser, Sonya Lilley, Anne Lund, Donna B. Johnson JADA, September, 2009 pages 1587-1592

# memorandum 

 Social and Economic PolicyAbt Associates Inc.

## Date <br> October 20, 2009

To Tracy Palmer, Ted Macaluso
From Susan Bartlett, Jacob Klerman
Subject Fresh Fruits and Vegetables Program Study: Number of Days of Operation per Week
The purpose of this memorandum is to respond to the first section of a memorandum from Tracy Palmer dated October 8, on variations in impacts with number of days per week that fresh fruits and vegetables are made available. Our response has three elements:

- We suggest that examining variation in number of operating days will not contribute to understanding the impacts of the FFVP.
- We suggest a slight change in the central research question and a corresponding change in the data collection.
- We describe how variations in impacts with numbers of days per week (and timing of environment changes) could be measured-with the conclusion that this would delay the study and would have substantial effects on the budget if statistical power was to be maintained at or near current levels.


## Implications of Variation in Numbers of Days of Operation for Quality of Offerings

The section of the FNS memorandum was entitled "Dose-Response or Full vs. Partial Implementation of FFVP". While we understand the interest of FNS and child nutrition advocates in variations in impacts, this nomenclature is seriously misleading. We wish to emphasize that variation in number of days per week does not correspond to either dose-response or full vs. partial implementation. With a fixed per-student budget, a school that offers fresh fruits and vegetables five times per week is offering less expensive selections than a school that offers them three times a week. The portions must be smaller, or the items must be of lower quality, or they must be cheaper types of produce. The choice made by the school regarding number of days per week presumably reflects their judgment of how best to spend the limited budget so as to have the maximum impact on children, balancing considerations of the size and appeal of the individual offerings and the frequency of reinforcement of the healthy eating message.

We think that advocates may be discounting the budget constraint, and may be mentally comparing offerings of the same qualities three vs. five times per week. If, however, the claim is that FFVP is more effective if the fixed budget is spread over five days per week, despite the contrary choices made by schools, we would like clarification of this hypothesis.

## Implications of Variations in Number of Days of Operation for Specification of the Research Questions

The research questions in the RFP were written to address the impacts of the program on days on which it was offered. A central impact question in the Statement of Work was:

To what extent does children's consumption on school days of fresh fruits and vegetables change on days in which the FFVP provides fresh fruits and/or vegetables to children?

Our study is currently designed to answer this question; we collect dietary recall data for students for days on which fresh fruits and vegetables were offered.

However, having carefully considered issues about days per week of distribution, we urge FNS to re-consider and modify this stated goal of the study. Measured outcomes in participating schools on a day in which FFVP was offered are likely to be larger in schools that implement fewer rather than more days per week. This is true because schools offering fewer days per week will be able to offer larger or better portions on those days.

We therefore suggest that FNS modify the research questions to focus on the overall effects of FFVP on children throughout the school week. If FNS makes that modification, we would visit schools on a random day of the week rather than on a day that the program was necessarily in operation. Note that this change would decrease the reported impact of the program relative to the current design. To understand this, suppose that all schools operate the program either 3 or 5 days per week. If, as currently planned, we visit schools only on days of operation, our treatment group will include both children who are getting the benefits of $1 / 5$ of their school's weekly FFVP budget and children who are getting the (presumably greater) benefits of $1 / 3$ of the school's weekly budget. If instead we visit schools on a random day, the benefits received by children in the treatment group will be independent of the frequency choice made by their schools, because 40 percent of the children from 3-day-a-week schools will be sampled on days of non-operation. In our judgment this is the correct way to measure the impact of FFVP. We are happy to discuss this issue further.

## Implications of Variations in Days of Operation and Timing of Environmental Changes for Subgroup Analyses

In its memorandum, FNS stated that the two subgroups of greatest interest were:

1. Participating schools that implement the FFVP more frequently (4 or 5 days a week) versus those that implement less frequently ( 1 to 3 days a week).
2. Schools that implemented policies for a healthier school food environment prior to application vs. schools that implemented policies for a healthier school food environment after their entry into the program (or after a comparable time point for non-accepted applicants) vs. schools that did not implement policies for a healthier school food environment either before or after.

These process-based subgroups are substantially more challenging for estimation of variations in impacts than subgroups that are based on fixed characteristics of schools or students (e.g. racial/ethnic composition). The challenge arises from the consideration that the same factors that dictate schools' decisions in these arenas (such as the quality of the pre-existing nutrition program, or the attitudes of the principal, the teachers, and the parents) could also affect student outcomes in the presence or absence of FFVP.

With regard to number of days of operation, we cannot know how many days the comparison schools would actually have operated the program if they had been selected. By studying their applications, we can however learn the number of days they planned to operate. We could therefore define subgroups of both treatment and comparison schools based on "more frequent planned operation" ( 4 or 5 days per week) and "less frequent planned operation" ( 1,2 , or 3 days per week). Potential drawbacks and limitations of this procedure are as follows:

- We would want to select approximately equal numbers of schools above and below the cutoff for each subgroup. States do not however attempt to balance selected schools on this consideration. We might find that schools around the cutoff are disproportionately in one group or the other, requiring us to go a considerable distance from the cutoff to make up our sample.
- The statistical power of our overall estimates would be reduced because of the need for disproportionate sampling and greater distance from the cutoff.
- We would need to review many hundreds of applications in the 16 States, both accepted and rejected, to perform the classifications. This will take both substantial calendar time and project resources.
- The result will be a subgroup comparison based on planned days of operation, not actual days of operation. We are uncertain as to the strength of the relationship between "planned" and "actual". This relationship could be measured ex post for the treatment group schools.
- The implications for sample size are considerable. A recent presentation by Klerman (and earlier papers in the biomedical literature by Rothwell and Wang) imply that detecting even moderate sized-differential impacts requires very large samples (typically four times as large as for detecting main impacts; slightly smaller if the sample is highly clustered; larger if the sample is highly imbalanced in the dimension of interest). If subgroup analysis is now a primary interest of FNS, we would advise considering quadrupling the sample size, probably by adding States.
- Schools that choose less frequent operation probably differ in important ways from schools that choose more frequent operation. Hence even though we will have valid impact estimates for the two subgroups, it requires a leap of faith to attribute the differential impacts to days of operation. Our conclusion would be descriptive of the impacts for the two groups of schools. It would not be prescriptive, in the sense that imposing a requirement of a particular frequency on schools would change impacts.

Similar considerations arise regarding timing of changes in the healthier school food environment. Again, our comparisons would be based on schools' planned changes, as reported in their applications. We would need to review substantial numbers of applications to assign the groups. The need for three balanced subgroups would have greater deleterious effects on the
statistical power for measuring main effects than two subgroups. If effects were needed for both types of subgroups, we would need to balance over six categories ( $2 \times 3$ ). Also, the results would be strictly descriptive.

It is not that subgroup analyses per se are difficult or impossible. The difficulty is with processbased subgroups, which (a) require time-consuming analysis of the applications, (b) can only be analyzed with respect to planned rather than actual values, and (c) can only yield descriptive results. These issues do not arise with regard to fixed school characteristics. Sample size considerations are however relevant for all subgroup analyses. Our original proposal proceeded on the assumption that USDA was interested in sub-group analyses, but that they were not the primary focus of the study (i.e., USDA did not have funds sufficient to power the study to detect all but the largest sub-group impacts).

Since our last conference call, we have given careful consideration to several other strategies which would not require considerable additional data collection. We have concluded that those other strategies would face severe threats to their internal validity and would not yield believable causal inferences. The underlying differences between schools that offer fruits and vegetables more versus fewer days per week would comprise an intractable source of selection bias. Given FNS's need for a study that will stand up to the scrutiny of the research community, we concluded that those methods were not worthy of further investigation.

# memorandum 

Social and Economic Policy

Abt Associates Inc.

Date

To Tracy Palmer, Ted Macaluso

From Susan Bartlett, Jacob Klerman

Subject Fresh Fruits and Vegetables Program Study: Participating and Nonparticipating Schools

The purpose of this memorandum is to respond to the third section of the October $8^{\text {th }}$ memorandum from Tracy Palmer. This section was entitled "Representativeness of the Sample" and deals with comparisons of school characteristics of various groups of schools. We would like to clarify the analyses we have planned to answer the research question posed. We believe FNS has a slightly different understanding about the analyses we are intending to perform.

## Planned Analyses

One of the research questions posed by FNS in the RFP was:
"For the School Years 2009-10 and 2010-11, what are the characteristics of the schools that were selected in each State to participate and how do they compare to those that were not selected? To other schools in the State or district?"

Our approach to answering this question is summarized in the Exhibit 1 on the following page. This analysis would be performed for each of the 16 study States and combined across all 16 States. The six columns in the exhibit refer to:
(1) all elementary schools in the State, according to the Common Core of Data (CCD);
(2) all elementary schools that are eligible according to the CCD, i.e. in which at least 50 percent of students are eligible for free/reduced price meals ${ }^{1}$;
(3) all elementary schools that are eligible according to the CCD, in districts that had at least one eligible applicant for FFVP;
(4) all elementary schools that applied for FFVP (and were eligible);
(5) all elementary schools that are eligible according to the CCD, in districts in which at least one school participates in FFVP;
(6) elementary schools participating in FFVP.

[^0]| Exhibit 1: Planned Comparisons of Participant and Nonparticipant Schools |  |  |  |  |  |  |
| :--- | :--- | :--- | :--- | :--- | :--- | :--- |
|  | $\begin{array}{l}\text { All elementary schools that are ... }\end{array}$ |  |  |  |  |  |
|  | $\begin{array}{l}\text { In } \\ \text { State } \\ (1)\end{array}$ | $\begin{array}{l}\text { Eligible } \\ (2)\end{array}$ | $\begin{array}{l}\text { ln districts } \\ \text { which have } \\ \text { eligible } \\ \text { applicants } \\ (3)\end{array}$ | $\begin{array}{l}\text { Eligible } \\ \text { applicants } \\ (4)\end{array}$ | $\begin{array}{l}\text { In districts } \\ \text { which have } \\ \text { FFVP } \\ \text { participants } \\ (5)\end{array}$ |  | \(\left.\begin{array}{l}FFVP <br>

participants <br>
(6)\end{array}\right]\)

Comparison of the first two rows for eligible applicants and for schools selected to receive FFVP (columns 4 and 6 ) will provide some guidance on how well the CCD measures current school characteristics.

For rows (2) through (4), this tabulation will tell us:

1. How eligible schools compare with all schools statewide with regard to poverty and demographics (columns 1 and 2): What does the eligibility screen accomplish? Are eligible schools notably poorer and otherwise different from other schools in the state?
2. How eligible applicants compare with all eligible schools in their districts (columns 3 and 4): Who chooses to apply? Are the schools that apply in each district drawn from among the poorer eligible schools, or are they otherwise different?
3. How FFVP schools compare with all eligible schools in their districts (columns 3 and 6): How do participants compare with eligible nonparticipants? Are the schools that participate in each district poorer or otherwise different from other eligible schools?
4. How FFVP schools compare with eligible applicants (columns 4 and 6 ): What does the selection process from among applicants accomplish? Are the schools that participate in general poorer or otherwise different from those that apply?
5. How FFVP schools compare with all other schools in their districts (columns 5 and 6): What is the final result of the selection process? Are the schools that participate in each district notably poorer and otherwise different from other schools in those districts?

In addition, for all 54 "states", we will collect some numerical information on the application process: number of eligible schools, number of schools applying, number of schools selected, and
limited information about the characteristics of the schools selected (\% with FSL 60-75 and above 75).

## Merging with the CCD

Our planned analysis requires that we merge the data we have received from States covering all schools that applied for FFVP in the 16 States (and were eligible). This match will support tabulations both for each State and for all 16 States combined. Furthermore, we will include a narrative discussion of how the state's approach to selecting schools affected the characteristics of the schools actually selected (assuming we resolve confidentiality issues).

Merging State lists with the Common Core Data (CCD) allows us to characterize schools by student demographics such as race and ethnicity, and by school characteristics such as highest and lowest grade served. FFVP eligibility (based on percent of students eligible for free and reduced price meals) is however time-dependent, and the information in the CCD will not be as current as the data on FFVP applications.

We also note that it is quite time intensive to match schools from State lists to the CCD. State lists include only school name and district. We will need to sort the CCD by State and district and then proceed to do the matches manually.

## FNS Memorandum

The language in the FNS memorandum that differs from our plan is as follows:

FNS believes this data provides the FRP numbers for the schools in the State and that under the contract Abt will inform us (for the 16 States) on how many schools in the State meet the FFVP FRP cutoff, of those how many applied, and of those how many are funded.

To get consistent counts for these would require that the States provide us with current information on percent free/reduced price for all schools meeting the 50 percent free/reduced price cutoff, regardless of whether they applied. With this information we could fill in column (2) in the first row of Exhibit 1. This data request would increase State burden. Our plan, in contrast, compares the State counts of applicants and participants (columns 4 and 6 in Exhibit 1) with CCD estimates of number of eligible schools.

Our current plan includes only simple counts beyond the 16 selected states. If FNS wants, Abt would be willing to cost out an implementation analysis for all 54 "states". An analysis like that would include requesting lists of schools from every states (eligible, applying, selected) as well as process information (i.e., how was the selection done). This would support 54 "case studies".

We look forward to guidance from FNS on this issue.


[^0]:    ${ }^{1}$ The CCD does not indicate whether a school participates in the NSLP. However, since over 90 percent of public school districts do participate, this should not substantially affect the comparisons.

