

Appendix K: Public Comments and Comments from Consultants Received

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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 3rd 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 non-participating schools.

**Review of Evaluation Plan: Evaluation of the Fresh Fruit and
Vegetable Program**
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.impactteen.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, 7th page. Regardless of decisions about the self-administered instrument, analytic questions about this issue, as seen on 7th 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 4th - 6th graders included in the package seem quite advanced and beyond the reading and comprehension levels of many 4th and 5th 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 09-10 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 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 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. 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.
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 4th and 5th graders level of comprehension and reading abilities. Use of fractions and decimals will also be beyond many 4th and 5th 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/SNDAlII-
Instruments.pdf](http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/SNDAlII-
Instruments.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 4th and 5th 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 4th graders and also includes questions on energy dense foods http://www.sph.uth.tmc.edu/catch/catch_em/4th%20SPAN%20Eng%20v8.pdf
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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To: Susan Bartlett From: Tracy Palmer
 Fax: 617-386-8311 Phone: _____
 Phone: _____ Date: 9/17/09
 Re: FFVP comments Pages: _____
from Lorelei DiSogra

Urgent **For Review** **Please Comment** **Please Reply** **Please Process**

● **Comments:**

STATE CHILD NUTRITION AGENCY SURVEY

A. Selection of FFVP schools

The following questions are about the application and selection of schools to participate in the FFVP in the 2009-2010 school year.

- 1 How did your agency solicit applications from school food authorities (SFAs) for their schools to participate in the FFVP for the 2009-2010 school year? Please check all that apply:
 - Announcement or requests for applications on website
 - E-mail or electronic newsletter announcement to all SFAs
 - Letter of invitation by mail to all SFAs
 - Application materials by mail to all SFAs
 - Invitation or outreach by e-mail, telephone, or mail to SFAs identified by the State as likely to be selected for the FFVP
 - Application materials provided only to SFAs identified by the State as likely to be selected for the FFVP
 - Meeting where SFAs could learn about FFVP and get application materials
 - Other (specify) _____

- 2 On what date was the availability of applications for the FFVP announced?
 Announcement date: ____/____/____

- 3 On what date were applications for the FFVP due?
 Application due date: ____ / ____ / ____

- 4 How did SFAs apply for their schools to participate in the FFVP? Please check all that apply:
 - Paper application
 - On-line application

- 5 What were the **minimum requirements** for participating in the FFVP? Please check all that apply and fill in blanks as appropriate.
 - Minimum percentage of students approved for free/reduced-price meals
 Specify minimum percentage: ____%
 - Minimum number of days per week/month for FFVP to be offered
 Specify minimum number of days ____ per week/month (circle one)
 - Minimum number of hours of nutrition education per week/month for each grade
 Specify minimum number of hours of nutrition education ____
 Per week/month (circle one)
 - Minimum number of partners
 Specify minimum number of partners: ____
 - Minimum percentage of FFVP budget provided by partners, in cash or in-kind
 Specify minimum percentage of FFVP budget provided by partners: ____%

Add Questions

11 Please indicate whether you strongly agree, agree, neither agree nor disagree, or strongly disagree with the following statements.

	Strongly agree	Agree	Neither agree nor disagree	Disagree
a. The application process was easy for SFAs to complete				
b. All SFAs were well-informed about the application process				
c. SFAs had sufficient time to prepare applications				
d. The State Agency (SA) had to relax the minimum requirements for FFVP schools in order to allocate all available funds				
e. The SA had to increase the minimum requirements for FFVP schools in order to limit the number of schools qualified for the FFVP				
f. More schools applied for the FFVP than the SA expected				
g. The SA expects enough applications for qualified schools to use the SY2010-2011 funds allocation				

g. Less schools applied for the FFVP than the SA expected

h. Do All eligible schools know about the availability of FFVP

i. Is the SA satisfied w/ the # of school applications for FFVP rec'd

B State FFVP guidance and oversight

12. In which of the following areas did your agency establish **State-specific** policies and recommended practices for the FFVP, in addition to those established by FNS?

- Implementation plans
- Partnerships
- Farm-to-cafeteria projects
- Purchasing cooperatives
- Promoting the FFVP to students and parents
- Selecting and purchasing fruits and vegetables
- Serving fruits and vegetables (distribution methods, time of day, portion sizes)
- Role of teachers in FFVP
- Food safety
- Nutrition education and promotion in connection with the FFVP
- Performance and expenditure reporting
- None of the above - only use FNS policies and recommended practices [SKIP]

1 wk frequency - times per week

of offering FFVP.

times/wk.

12a. Please provide a copy of your State's policies or a link to the web page where they are available

- Hard copy submitted by mail (use reply envelope provided with your survey invitation)
- Electronic copy submitted by e-mail to [STUDY ADDRESS]
- URL for policies: http: _____

13. Did your State provide suggested nutrition education curricula or materials for use in conjunction with the FFVP?

- Yes
- No [SKIP TO 14]

13a. Which of the following topics were included in these nutrition education curricula or materials? (Check all that apply)

- Role of fresh fruits and vegetables in a complete diet
- Where fresh fruits and vegetables come from, links to local farms
- Trying new foods, variety
- Healthy and less healthy snacks
- Cooking with fresh fruits and vegetables
- Healthy weight and overweight
- Physical activity
- Other (Please specify: _____)

Goal setting
 ← *for each # of*
FTV SVG's

13b. What audiences were targeted by these nutrition education curricula or materials? (Check all that apply)

- Pre-school and kindergarten
- Grades 1-3
- Grades 4-7
- Older children
- Parents

recommended by
DC's

14. What monitoring and technical assistance activities for the FFVP have you conducted in the last 12 months? (Check all that apply)

- In person training or conference
- Web/conference-call training
- Periodic web meetings/conference calls
- Scheduled site visits
- Unannounced site visits
- Help line/assistance on-call from State agency
- Help line/assistance on-call from partners
- Review of financial records supporting claims

feed back to partners to improve
implementation

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?

- ◊ Yes
- ◊ No (SKIP TO 16)

15a. Please check all types of partners that work with your State Agency to carry out the FFVP.

- Produce for Better Health
- Healthcare providers, including hospitals and clinics; doctors, nurses, nutritionists, dietitians/dietetic interns, or other clinicians/practitioners
- Community Health Agencies
- City, County, State, or Tribal government agency (e.g. health departments, agriculture departments, etc.)
- Cooperative Extension Service
- Grocers and stores, farmers' markets, or other food distributors
- Vocational clubs
- Produce associations/commodity groups
- Nutrition trade associations (e.g. American Dietetic Association)
- Health associations (e.g. State or National arthritis or Heart Associations)
- Universities, colleges, or other higher education
- Community action agency, food bank, or other community-based organization
- Other (specify): _____

Expand question to other state agencies (Ag/Health) that may be federally funded to capture full picture

Produce Companies / produce growers/farmers

18. Which of the following types of information does your Agency collect on a monthly basis from FFVP schools?

- Number of days that FFVP foods were offered
- Number of days that nutrition education was offered as part of FFVP
- Number of students with access to FFVP
- Operating cost broken down between food, labor, and supplies
- Breakdown of food cost by category (fruits, vegetables)
- Food purchase cost detail by item or category (e.g., total spent on apple etc.)
- Quantity purchased for each food item
- Unit size (as purchased) and price for each food item
- Detail of operating cost for labor
- Detail of operating cost for supplies
- Administrative cost broken down between labor, equipment, and other
- Detail of administrative cost for labor
- Detail of administrative cost for equipment
- Detail of other administrative cost
- Narrative of nutrition education provided as part of FFVP
- Narrative of FFVP promotion activities
- Narrative of issues or challenges
- Narrative of goals met or accomplishments
- Plans or goals for next month(s)

*Types of FFV
Served / offered
each month.*

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

- Hard copy submitted by mail (use reply envelope provided with your invitation)
- Electronic copy submitted by e-mail to [STUDY ADDRESS]
- URL for claim form and instructions: http://_____

19. What is the maximum amount of FFVP grant funds that your State could spend from July 1, 2009 and June 30, 2010 for State administration, based on the FNS rules?

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

19a. What does this figure represent?

- 5% of the grant
- Salary alone for full-time coordinator (SKIP TO 19c)
- Salary plus fringe benefits for full-time coordinator
- Other (Please specify: _____)

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

Counts of schools	
a. Number of schools submitting applications	
b. Number of schools applying for FFVP and meeting minimum Federal and State requirements	
c. Number of schools approved for FFVP	
d. Number of schools approved for FFVP that withdrew before starting FFVP operations	
Enrollment data	
e. Total enrollment in schools applying for FFVP	
f. Total enrollment in schools applying for FFVP and meeting minimum Federal and State requirements	
g. Total enrollment in schools approved for FFVP	
h. Smallest percentage of students approved for free/reduced-price in schools approved for FFVP	
Counts of SFAs	
i. Number of SFAs with at least one school submitting an application	
k. Number of SFAs with one school approved for FFVP	
l. Number of SFAs with more than one school approved for FFVP	

F4 Does this apply
40 applications for
School year 10-11 ?

15. Please indicate whether you strongly agree, agree, neither agree nor disagree, disagree, or strongly disagree with the following statements regarding the FFVP application process for SY 2010-2011.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
a. The application process was easy for SFAs to complete					
b. All SFAs were well-informed about the application process					
c. SFAs had sufficient time to prepare applications					
d. The State Agency (SA) had to relax the minimum requirements for FFVP schools in order to allocate all available funds					
e. The SA had to increase the minimum requirements for FFVP schools in order to limit the number of schools qualified for the FFVP					
f. More schools applied for the FFVP than the SA expected					
g. The SA expects enough applications for qualified schools to use the SY2010-2011 funds allocation					

Add Same Q's suggested earlier

[THIS QUESTION ONLY FOR THE 16 STATES WITH SAMPLE SCI

F6. Please provide copies of the FFVP claims for July 2009 through J following schools:

[LIST ALL FFVP SCHOOLS IN SAMPLE]

We prefer to receive these data in electronic form, or in a computer printc claims include information that is not in the electronic system, such as na need copies of the actual claims. You can provide electronic or paper cop

Electronic data may be sent by e-mail to [STUDY EMAIL ADDRESS]. data by secure file transfer, send a request to the study staff by e-mail.

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

of
is of
test



expand to collect more data

FFVP
School Food Environment
Draft 8/13/2009

School Food Environment Assessment

Date: _____ Time: _____ Observer Initials: _____ School ID#: _____

A. FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)

1. Before the students arrive, **photograph:** *None can vary - need to clarify.*
 FFVP serving area(s) (include all food served) Entire FFVP area (including the eating area)
Counting out in cafeteria to put in bins for each classroom.

2. How is FFVP served:
 Classroom (describe method of delivery _____)
 Cafeteria (describe method of service _____)
 Other (specify all that apply)
 Kiosk Vending machine Hallway Office
 School store Food cart Snack bar Other: _____

3. **Service lines:** Not applicable, OR
Line length (Approx. number of students in longest lines) _____
Most of the time the lines are: Progressing steadily Progressing slowly Not hardly moving

4. Number of **points of service:** Not applicable, OR
 One Two Three Four Five

5. **Overall serving/eating environment:**
 Exceptional Pleasant (*clean, cheerful, inviting*) Acceptable (*clean, well-maintained, but sparse*) Unpleasant (*dirty, dingy, or in need of maintenance*)

6. **Nutrition promotion materials/education present?** (*check all that apply*) *Teachers*
 Nutrition posters #: _____ Taste testing Staff providing education
 Nutrition displays #: _____ Staff encouraging student None of the above
Teachers

7. Record any other observations about the **servicing or eating environment(s).**
Take expressions, enjoyment, reaction experiences of students

List each fruit/vegetable in the table below: (NOTE: juice cannot be served as part of FFVP; if mixture such as fruit kabobs, write item on one line and components on following lines)

List each fruit/vegetable	Whole/Sliced/Halved/Peeled/Sectioned/Mashed/Pureed	Mode of Presentation/Packaging (i.e. plates/utensils, pre-packaged)	Appeal +,0,-

NOTE WITH A "+" ANY OF THE ABOVE ITEMS THAT ARE UNUSUALLY APPEALING, WITH A "-" ANY ITEMS THAT ARE UNAPPEALING, WITH "0" look fine but not especially appealing.

9. ²² Do the **fresh fruit** look fresh, crisp, ripe and otherwise in **good condition**? *(not wilted, brown, bruised, or over-ripe)*

Most or all Some Almost none or none Not served

10. Do the **fresh vegetables** look fresh, crisp, ripe and otherwise in **good condition**? *(not wilted, brown, bruised, or over-ripe)*

Most or all Some Almost none or none Not served

11. Is any other type of **food or condiment** served with the FFVP?

No Dip (Describe: _____) Other (Describe: _____)

12. Record any other observations about the **fruits or vegetables served**.

zk

13. Describe the overall **staff attire**:

Exceptional Nothing notable *(plain and clean)* Some areas of concern

Describe the overall staff attitude:

- Engaging with students (*smiling, interactive, encouraging*)
- Neutral/Normal (*interact enough to process their meal*)
- Impolite, impatient or negative with students
- Unable to observe

15. Are the students **eating the fruit(s) that they take?**

- Most
- Some
- Little
- None

16. Are the students **eating the vegetable(s) that they take?**

- Most
- Some
- Little
- None

17. If more than one type of fruit/vegetable is offered, which one(s) are **most frequently selected** by the students? (Note only those that are clearly more popular than others & confirm with staff)

- Only one type offered
- All options about equally popular
- One or some more frequently selected than other

List: _____, & _____

18. Compared to how much fruit/vegetable was available, how much was **taken/distributed?**

- Most
- Some
- Little
- None

19. Pick up a copy of the current FFVP **menu**. Note any differences with actual foods served and any substitutions.

- No difference
- Different fruit offered (write in substitution: _____)
- Different vegetable offered (write in substitution: _____)
- Other (describe: _____)

menu will be monthly

20. Anything notable about **student behaviors, attitudes or response** to the FV being served?

School Foodservice Manager Interview

Date: _____

Interviewer Initials: _____

School ID#: _____

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 15-20 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?

*ask for monthly ~~FFVP~~
& ~~men~~ for ~~FFVP~~*

A. About Interviewee

1. What is your current position?
- ₁ School foodservice manager
 - ₂ District foodservice manager
 - ₃ Other _____

*menue
menus for
All months*

2. About how long have you been at this position at this school? _____ years

Fresh Fruit and Vegetable Program (Intervention Schools Only)

as part of the FFVP

Your school provides fresh fruits and vegetables to students as free snacks – 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) ₁ Today ₂ Yesterday
2. What is the typical length of each daily FFVP period? (mark N/A if not offered other periods)
- a. _____ minutes for period 1 Grades served: _____
 - b. _____ minutes for period 2 Grades served: _____
 - c. _____ minutes for period 3 Grades served: _____
 - d. _____ minutes for period 4 Grades served: _____

3. What is the maximum and minimum number of servings of fruit a student can take a part of FFVP?
- a. Maximum # of servings:
 - ₁ One
 - ₂ Two
 - ₃ Unlimited
 - b. Minimum # of servings:
 - ₁ Zero
 - ₂ One
 - ₃ Two
- in packages*
in paper bowls

4. What are the maximum and minimum numbers of servings of vegetables a student can take as part of FFVP?
- a. Maximum # of servings:
 - ₁ One
 - ₂ Two
 - ₃ Unlimited
 - b. Minimum # of servings:
 - ₁ Zero
 - ₂ One
 - ₃ Two
- in packages*
in paper bowls

*mostly delivered to classroom
in students pick up on way to
lunch*

You will read a series of statements about your school's fresh fruit and vegetable program. For each statement, decide if you agree or disagree and then whether you strongly or somewhat agree or disagree. There are no right or wrong answers.

		Agree Strongly	Agree Somewhat	Disagree Somewhat	Disagree Strongly
5.	Students like to eat the fresh fruit snacks.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
6.	Students like to eat the fresh vegetable snacks.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
7.	I wish more students took the fresh fruit snacks.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
8.	I wish more students took the fresh vegetable snacks.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
9.	Students eat most of the fresh fruit they take.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
10.	Students eat most of the fresh vegetables they take.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
11.	I think that students eat more fruits and vegetables at school on days when they are offered as a free snack at school.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
12.	I think that students eat fewer unhealthy snacks at school on days when fruits and vegetables are offered as a free snack at school. <i>same</i>	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
13.	The fresh fruit and vegetable snacks should be offered more days during the week.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
14.	The fresh fruit and vegetable snacks should be offered more times each day.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
15.	We sometimes run out of fresh fruit or vegetable snacks and have to turn kids away.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
16.	The fruits in the program are good quality.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
17.	The vegetables in the program are good quality.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
18.	I am satisfied with the variety of different kinds of fruits were offered in the program.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
19.	I am satisfied with the variety of different kinds of vegetables were offered in the program.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
20.	I would like the fresh fruit and vegetable snack program to continue. <i>in my school</i>	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
21.	Overall, my opinion of the fresh fruit and vegetable snack program is favorable.	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4
22.	If I could change one thing about the fruit and vegetable snack program it would be:	Write in: _____			

*never
1 of 10 days
all*

*each
each*

I think ~~my~~ students benefit from the FFVP. The Fresh F&V students receive in the FFVP only maybe be Fresh F&V they

Has the Other questions /
 FFUP influenced
 where FV you
 serve in school
 Lunch.

Has the FFUP presented
 in students taking
 eating in the FV
 in school
 Lunch

Now 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?	<input type="checkbox"/> ₁ Very	<input type="checkbox"/> ₂ Moderate-ly	<input type="checkbox"/> ₃ Not very	
24.	If you could change one thing about the fresh fruit and vegetable snack program, what would it be?	(Write in) <i>Same as Q22</i>			
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?	<input type="checkbox"/> ₁ Yes	<input type="checkbox"/> ₂ No	<input type="checkbox"/> ₃ Don't know	
	a) (If yes to above) How has portion size changed? (check all that apply)	<input type="checkbox"/> ₁ Smaller portions of fruits	<input type="checkbox"/> ₂ Smaller portions of veggies	<input type="checkbox"/> ₃ Larger portions of fruits	<input type="checkbox"/> ₄ Larger portions of veggies
	b) (If yes to above) Why did you change the portion size?	<input type="checkbox"/> ₁ Student demand	<input type="checkbox"/> ₂ Price changes in produce	<input type="checkbox"/> ₃ Other funding issues	<input type="checkbox"/> ₄ Other (Write in)
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 program? (write in)	_____	_____	_____	
30.	During this current school year, has the fresh fruit and vegetable program been promoted by foodservice staff using _____?	Yes	No		
	a) posters or displays	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<i>what about other school officials: principal teachers nurse?</i>	
	b) fliers sent home	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
	c) taste tests	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
	d) nutrition education classes/instruction	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
	e) verbal encouragement when snacks are distributed	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
	f) loudspeaker announcements	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
	g) other (write in)	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂		
31.	For each strategy marked in 30-36 ask How often during this current school year has foodservice staff promoted the fresh fruit and vegetable program using _____?	Rarely or never	A few times a year	Monthly	Weekly or more
	a) posters or displays	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	b) fliers sent home	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	c) taste tests	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	d) nutrition education classes/instruction	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	e) verbal encouragement when snacks are distributed	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	f) loudspeaker announcements	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄
	g) other (write in)	<input type="checkbox"/> ₁	<input type="checkbox"/> ₂	<input type="checkbox"/> ₃	<input type="checkbox"/> ₄

Fresh

SFA SURVEY FOR FFVP EVALUATION (8-14-2009 DRAFT)

?? INSERT INTRODUCTION ON PURPOSE OF SURVEY. TO BE TAILORED TO 3 TYPES OF SFAS BASED ON SAMPLE SCHOOLS: FFVP ONLY, FFVP AND NON-FFVP, NON-FFVP ONLY

Does it make sense

F. General questions about the FFVP.

The Fresh Fruit and Vegetable Program (FFVP) provides free fresh fruits and vegetables to students in participating schools in your district outside of normal school-provided meals. This part of the survey asks you to provide information and opinions about the general administration and implementation of the FFVP in your district.

Fl. In what school year did your district first participate in the FFVP?

to 2009

- Before SY2008-2009
- 2008-2009
- 2009-2010

[SKIP PATTERN: IF F1="2009-2010," SKIP F1a AND F2]

F1a. Below is a list of sampled schools in your district that, according to our records, are participating in the FFVP during the current 2009-2010 school year. For each school, please indicate the school year in which that school first participated in the FFVP.

School	Before 2008-2009	2008-2009	2009-2010
School 1			
School 2			
...			
School N			

to Assess Vendors - Ask for FFVP monthly / weekly meals

Many of these SFA stays are being involved in implementation of FFVP, almost all FFVP Tracking added marketing the FFVP to other vendors, etc.

Comment 1013: This module to be administered to FFVP SFAs only.

what does this mean? Not clear to me

F2. For those schools in your district that participated in the FFVP prior to the current 2009-2010 school year, have there been any changes in program implementation in the current school year?

School	Fruit and vegetable distribution methods	Number of days FFVP is offered	Nutrition education and promotion activities	Involvement of outside partners	Variety of fruits and vegetables offered	Total quantity of fruits and vegetables served per month
School 1	Add new Drop No change	More Less No change	More Less No change	More Less No change	More Less No change	More Less No change
School 2	Add new Drop No change	More Less No change	More Less No change	More Less No change	More Less No change	More Less No change
School N	Add new Drop No change	More Less No change	More Less No change	More Less No change	More Less No change	More Less No change

Comment [Q2]: School list should be populated with only those schools with FFVP in operation before 2009-2010 as indicated in F1.

F3. The FFVP encourages development of partnerships with non-Federal entities. Does your district maintain relationships with any outside partners as part of the FFVP? Please include only district-wide partnerships for all FFVP schools, not relationships maintained by individual schools in your district.

Am Quastin News to also include state govt

F3a. Please check all partnerships that apply for your district.

partners & other federal programs.

- Produce for Better Health
- Healthcare providers, including hospitals and clinics; doctors, nurses, nutritionists, dietitians/dietetic interns, or other clinicians
- Community Health Agencies
- City, County, State, or Tribal government agency (e.g. health departments, agriculture departments, etc.)
- Cooperative Extension Service
- Local grocers and stores, farmers' markets, or other food distributors
- Vocational clubs
- Produce associations/commodity groups *Perdue Companies (growers/haens)*
- Nutrition trade associations (e.g. American Dietetic Association, School Nutrition Associations)
- Health associations (e.g. State or National affiliates of the American Cancer, Diabetes, or Heart Associations)
- Universities, colleges, or other higher education institutions
- Community action agency; food bank; or other community/fairth-based organization

but capturing full picture

Other (specify): _____

F4a. In a typical week, which of the following statements best describes the relationship of the fresh fruits or vegetables you offer to students in schools in your district through the FFVP and the fruits or vegetables you offer through the USDA National School Lunch Program? (Please check one statement only.)

- The specific fruits or vegetables promoted by the FFVP each week are also intentionally served in National School Lunch Program meals in the same week. *Provided*
- The specific fruits or vegetables promoted by the FFVP each week are intentionally avoided in National School Lunch Program meals in the same week.
- No attempt is made to coordinate offerings of specific fruits or vegetables promoted by the FFVP each week and offered through the National School Lunch Program.

Fresh Provided/Served

F4b. In a typical week, which of the following statements best describes the relationship of the fresh fruits or vegetables you offer to students in schools in your district through the FFVP and the fruits or vegetables you offer through the USDA School Breakfast Program? (Please check one statement only.)

- The specific fruits or vegetables promoted by the FFVP each week are also intentionally served in School Breakfast Program meals in the same week.
- The specific fruits or vegetables promoted by the FFVP each week are intentionally avoided in School Breakfast Program meals in the same week.
- No attempt is made to coordinate offerings of specific fruits or vegetables promoted by the FFVP each week and offered through the School Breakfast Program.

Add: within the next few weeks

Some Revisions to Q's of some add AOD's

F5. Please indicate whether you strongly agree, agree, neither agree nor disagree, disagree, or strongly disagree with the following statements.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
a. The application process for the FFVP was easy to complete.					
b. The State Agency provided clear and sufficient information about the application process.					
c. Our SFA had sufficient time to prepare applications for interested schools.					
d. The State Agency approved the schools where our SFA wanted to offer the FFVP.					
e. The school selection process for the FFVP was fair.					

f. ~~FA~~ *eligible*
 Our SFA has other schools
 that would like to part in
 FFVP

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

M2a. Compared to the 2007-2008 school year, would you say you now serve more, less, or about the same amount of the following types of foods as part of the School Breakfast Program in the schools we just listed? (Check one response for each food.)

	More of this food since 2007-2008	About the same amount of this type of food	Less of this type of food since 2007-2008
Vegetables:			
Fresh		1	
Frozen	6	1	
Dried	1	3	1
Canned	1	3	
Fruits:			
Fresh			
Frozen			
Dried			
Canned			

M2b. Compared to the 2007-2008 school year, would you say you now serve more, less, or about the same amount of the following types of foods as part of the **National School Lunch Program in the schools we just listed?** (Check one response for each food.)

	More of this food since 2007-2008	About the same amount of this type of food	Less of this type of food since 2007-2008
Vegetables:			
Fresh	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Frozen	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dried	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Canned	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fruits:			
Fresh	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Frozen	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Dried	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Canned	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

M2c. Have you changed the overall variety of fruits and vegetables offered to students in the schools we just listed? In particular,....

M2c_i. Have you changed the overall variety of fruits and vegetables served to students through the **School Breakfast Program** since the 2007-2008 school year?

- Yes, offer greater variety of fruits and vegetables since 2007-2008
- Yes, offer less variety of fruits and vegetables since 2007-2008
- No, no change in variety of fruits and vegetables since 2007-2008

M2c. ii. Have you changed the overall variety of fruits and vegetables served to students through the National School Lunch Program since the 2007-2008 school year?

- Yes, offer greater variety of fruits and vegetables since 2007-2008
- Yes, offer less variety of fruits and vegetables since 2007-2008
- No, no change in variety of fruits and vegetables since 2007-2008

M2d. Compared to the 2007-2008 school year, would you say that sales in the schools we just listed from each of the following SFA-operated venues have increased, decreased, or stayed about the same? (Please check only one box in each row. Do not include sales from sources not operated by the SFA.)

	No sales from this venue in 2007-2008 or now	More sales from this venue since 2007-2008	About the same sales from this venue since 2007-2008	Less sales from this venue since 2007-2008	Venue eliminated after 2007-2008
Vending machines	-	1	1	-	-
A la carte foods	-	1	1	-	-
Snack bar	1	1	1	-	-
Other SFA-operated venues	3	1	1	-	-
Total food sales outside USDA meals programs	3	1	1	-	-

[IF NO SALES IN 2007-2008 OR NOW FROM ANY SOURCES LISTED IN M2d, SKIP TO M3.]

M2e. Compared to the 2007-2008 school year, would you say you now serve more, less, or about the same amount of the following types of foods in SFA-operated venues outside of USDA school meals programs in the schools we just listed? Please include sales from vending machines, a la carte foods, snack bars, and other SFA-operated venues. (Check one response for each food.)

~~Server~~
 suggest this
 to be clearer

M5. Please indicate which of the following schools regularly offer **free snacks** to students, **other than** snacks funded by the USDA Fresh Fruit and Vegetable Program. If so, please indicate what time(s) of day, how many days per week these other free snacks are usually offered, what types of foods are usually offered, and what sources provide the funding.

FFVP

FFVP

	School 1	School 2	School 3	School 4	School 5	School 6	
a. Are free snacks offered to students, other than snacks funded by the USDA FFVP?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (SKIP TO S1)	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
b. To what grade levels are free snacks offered?	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade	<input type="checkbox"/> Pre-Kindergarten <input type="checkbox"/> Kindergarten <input type="checkbox"/> 1st grade <input type="checkbox"/> 2nd grade <input type="checkbox"/> 3rd grade <input type="checkbox"/> 4th grade <input type="checkbox"/> 5th grade <input type="checkbox"/> 6th grade <input type="checkbox"/> 7th grade <input type="checkbox"/> 8th grade
c. Time of day that non-FFVP free snacks are offered (Check all that apply)	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	<input type="checkbox"/> Before school <input type="checkbox"/> After breakfast, before lunch <input type="checkbox"/> After lunch, before end of school <input type="checkbox"/> After school as part of USDA program	

Comment [CWL 7]: Names of all sample schools will be filled here.

School-specific questions about the FFVP

This part of the survey asks about distribution of free fresh fruits and vegetables as part of the Fresh Fruit and Vegetable Program at [SCHOOL NAME] during the week of [REFERENCE WEEK]. If necessary, you may wish to consult with representatives from [SCHOOL NAME] to help you answer these questions as accurately as possible.

Comment [08]: This module to be administered to only FFVP S/PAs, and will be filled out separately for each sample school.

S1. How were fresh fruits or vegetables distributed to students at [SCHOOL NAME] during the week of [REFERENCE WEEK] as part of the FFVP? Please check all distribution methods that apply.

- Kiosks
- Inside classrooms
- Free vending machines
- School cafeteria
- Hallway
- Office (nurse, other)
- Snack bar
- School store
- Cart/other mobile method
- Other method 1 (Please specify: _____)
- Other method 2 (Please specify: _____)

Need to define kiosk

S4. The list below includes all fruits or vegetables that you reported were distributed in [SCHOOL NAME] during the week of [REFERENCE WEEK]. For each fruit or vegetable listed, please rate its overall quality.

Fresh

What kind of descriptions? This kind changes in all surveys.

Hydred Provided Sealed

Fruit or vegetable	Quality
Fruit 1	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
Fruit 2	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
...	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
Fruit N	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
Vegetable 1	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality

Comment [911]: Populate fruit or vegetable list with all fruits & veggies reported in S2.pdf

Fruit or vegetable	Quality
Vegetable 2	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
...	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality
Vegetable N	<input type="checkbox"/> Very poor quality <input type="checkbox"/> Somewhat poor quality <input type="checkbox"/> Average quality <input type="checkbox"/> Somewhat high quality <input type="checkbox"/> Very high quality

S5: The list below includes all fruits or vegetables that you reported were distributed in [SCHOOL NAME] during the week of [REFERENCE WEEK]. For each fruit or vegetable listed, please rate its popularity with students.

see previous comments

Fruit or vegetable	Popularity with students
Fruit 1	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
Fruit 2	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular

Comment [01.1]: Populate fruit or vegetable list with all fruits & veggies reported in S2 grid.

Comment [01.2]: Populate fruit or vegetable list with all fruits & veggies reported in S2 grid.

...	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
Fruit N	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
Vegetable 1	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
Vegetable 2	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
...	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular
Vegetable N	<input type="checkbox"/> Very unpopular <input type="checkbox"/> Somewhat unpopular <input type="checkbox"/> Average popularity <input type="checkbox"/> Somewhat popular <input type="checkbox"/> Very popular

what about a series
 of D's about capturing
~~the~~ D's in the
~~the~~ D's in the
 of students' responses
 to the survey
 Time Trying

Don't like fresh Apples/Provided

[FOR ANY "COMMON FRUITS AND VEGETABLES" FROM OUR PREPOPULATED LIST, ASK]

S6: The list below includes some common fruits and vegetables that you did *not* report were distributed in [SCHOOL NAME] during the week of [REFERENCE WEEK]. For each item listed, please indicate

- whether this fruit or vegetable is ever ~~distributed~~ as part of the FFVP at [SCHOOL NAME], and;
- if so, why it was not distributed during [REFERENCE WEEK]? — *They can only serve max 5/week*

Fruit or vegetable	Ever distributed?	Why never distributed?	Why not distributed during [REFERENCE WEEK]?
Fruit 1	Yes No <i>Provided</i>	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)
Fruit 2	Yes No	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)
...	Yes No	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)	<input type="checkbox"/> Too expensive <input type="checkbox"/> Too messy <input type="checkbox"/> Too much work to prepare <input type="checkbox"/> Out of season or otherwise hard to obtain <input type="checkbox"/> Unpopular with students <input type="checkbox"/> Other reason. (Please specify:)

Comment [013]: "common" fruits and vegetables refers to the program-wide list generated from FFVP admin data as discussed above.

Comment [014]: Populate fruit or vegetable list with all fruits & veggies from "common" list NOT reported in grid.

Comment [015]: "Gray out" unless ever distributed in first column = no.

Comment [016]: "Gray out" unless ever distributed in first column = yes

PROGRAM

S6. Looking at fresh fruit and vegetable distribution activities in [SCHOOL NAME] during the week of [REFERENCE WEEK], would you say this was a typical week for the program?

- Yes
- No

S6a. If no, how did this week differ? (Check all that apply.)

- Different school schedule due to holiday or other event
- Fresh fruits and vegetables offered more days than usual
- Fresh fruits and vegetables offered fewer days than usual
- Greater variety of fresh fruits and vegetables offered than usual
- Lesser variety of fresh fruits and vegetables offered than usual
- Greater amount of fresh fruits and vegetables offered than usual
- Lesser amount of fresh fruits and vegetables offered than usual
- Other (Please specify _____)

Some new FF+V offered like we

are more not identified

many don't know about

wide variety available

don't appear -

value added

etc

I don't think this should be part.

Finally, we would like to ask you about your opinions of the Fresh Fruit and Vegetable Program. For each statement, please tell us whether you agree or disagree.

1	The students in my school district like to eat the fruit and vegetable snacks offered at school.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
2	I wish more of the students in my school district ate the fruit and vegetable snacks offered at school.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
3	I think that students eat more fruits and vegetables at school on days when they are offered as a snack at school.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
4	I think that students eat fewer unhealthy snacks at school on days when fruits and vegetables are offered as a snack at school.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
5	The fruit and vegetable snacks should be offered more often (for example, on more days or more times during the day).	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
6	The fruit and vegetable snacks offered in my school district are good quality.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
7	I am satisfied with the variety of different kinds of fruit and vegetable snacks offered in my school district.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
8	I would like the Fresh Fruit and Vegetable Program to continue to be offered in my school district.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
9	Overall, my opinion of the Fresh Fruit and Vegetable Program is favorable.	<input type="checkbox"/> Agree Strongly	<input type="checkbox"/> Agree Somewhat	<input type="checkbox"/> Disagree Somewhat	<input type="checkbox"/> Disagree Strongly	<input type="checkbox"/> Don't know
10	If I could change one thing about the fruit and vegetable snack program it would be:	[response here]				

Fresh

Fresh

Fresh

to note points in district?

what is the point, are ate in period?

Need to clarify

How list needs to be expanded to capture other positive long opinions

X1. CLAIM REQUEST. (THIS WILL BE ASKED IF STATE DOES NOT HAVE FOOD ITEM DETAIL FOR FFVP CLAIMS. MATERIALS FOR RETURNING COPIES TO BE SENT WITH LETTER INVITING SFA TO COMPLETE SURVEY)

Please send copies of the FFVP reimbursement claims for [REFERENCE MONTH AND TWO PRIOR MONTHS] for the following schools: [LIST SAMPLE SCHOOLS]. Please include lists of specific foods purchased for the FFVP during these months.

Thank you for completing this survey!

Other possible questions

How in Utah are you in the implementation
of the FFVP in schools in your district?

What role do they play?

SCHOOL PRINCIPALS SURVEY FOR FFVP EVALUATION (8-14-2009 DRAFT)

[INSERT INTRODUCTION ON PURPOSE OF SURVEY, TO BE TAILORED FOR FFVP SCHOOLS, NON-FFVP SCHOOLS]

Nutrition Education

more

N1. Nutrition education and promotion activities may encourage students to eat fresh fruits and vegetables, and to make other healthy eating choices. Please complete the chart below indicating the days and times when **nutrition education or promotion activities** occurred at [SCHOOL NAME] during the week of [REFERENCE WEEK]. Nutrition education or promotion activities are events such as classroom instruction, demonstrations, hands-on learning, special speakers, or showing videos. Do not count here any nutrition education displays, such as posters or banners, or distributing media such as newsletters, etc.

Nutrition	Monday	Tuesday	Wednesday	Thursday	Friday
-----------	--------	---------	-----------	----------	--------

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

I think P. will have trouble answering this level of detail about NUTED

Don't think S should start up Tutorials on outtakes. Start w/ the archiving of. About previous -.

Comment (WILL): Need to define reference week for supp. FFVP sample if Q is asked of them

N2b. . . . about how long was the nutrition education or promotion activity for each class of students? [If "YES" in N2a or multiple grades checked in N2a_j, add clarification.] If the nutrition education or promotion activity was of shorter or longer duration for different grade levels, please report the average amount of time for each class.

_____ average minutes per class

N2c. What message(s) were conveyed by the nutrition education or promotion activity? Please check all that apply.

- Eat a variety of foods
- Eat more fruits and vegetables
- Eat lower fat foods more often
- Be physically active
- Other messages. (Please specify: _____)

N2d. Was the nutrition education or promotion activity focused on or intended to promote specific foods served during the same week in any of the following programs? For example, dark green vegetables might be featured in nutrition education and in the lunch menu. Please check all that apply.

- USDA School Breakfast Program
- USDA National School Lunch Program
- USDA Fresh Fruit and Vegetable Program
- USDA After-School Snack Program
- Other program (specify)

N2e. What types of professionals or volunteers conducted or led the nutrition or promotion activity? Please check all that apply.

- Classroom teacher
- Principal or administrator
- Nutritionist or dietician *disthan*
- Doctor, nurse, or other health professional
- Trained non-professional
- Other (Please specify: _____)

Q5. During the 2009-2010 school year, is the average time per week spent on nutrition education in [SCHOOL NAME] more than, less than, or about the same as in the 2007-2008 school year?
 More than in 2007-2008
 Same as in 2007-2008
 Less than as in 2007-2008
 Don't know

N6. Please indicate what types of policies your school or school district has (if any) regarding the availability of healthy food choices when foods are offered to students outside of school meals. Healthy food choices are foods that meet school district or State standards for nutrient content, such as limits on fat, salt, or added sweeteners. Please check a response for each row below.

Type of occasion	Not applicable at my school.
Foods sold on regular basis outside of school meals (snack bar, vending machines, school store, etc.)	
Foods sold on special occasions during school (fund-raisers, festivals, etc.)	
Foods sold before/after school	
Foods offered free to students during school hours (parties, etc), not including snacks provided by a Federal, State, or district program	
Foods given to individual students as rewards	

Are limiting
What about
White Spans
more + TV
NO

N7. Does your school have an advisory/policy group of parents or community members who provide input on the types of foods offered in the school?
 Yes
 No (SKIP TO C1)

Policy about Wellness Policies

N7a. Which of the following types of meals, snacks, and other food offerings does this parent/community advisory/policy group have input on? Please check all that apply.

- School Breakfast Program
- National School Lunch Program
- Fresh Fruit and Vegetable Program
- Snacks for after-school program
- Other snacks provided by school
- Sales of foods outside of the above
- Other foods offered to students during school
- Other foods offered to students before/after school, on school grounds

Competitive foods module

C1. Compared to the 2007-2008 school year, would you say that sales of foods from each of the following venues operated by your school have increased, decreased, or stayed about the same? (Please do not include sales for venues operated by your district School Food Authority.) Please check an answer in each row.

	No sales from this venue in 2007-2008 or row	More sales from this venue since 2007-2008	About the same sales from this venue since 2007-2008	Less sales from this venue since 2007-2008	Venue eliminated after 2007-2008
Vending machines					
A la carte foods					
Snack bar					
Other school-operated venues					
Total food sales from school-operated venues					

*Will they know this?
 Jewelry detail
 are there
 blue*

Comment [CWL 2]: to be greyed out in non-FY-VP schools

SALES IN 2007-2008 OR NOW FROM ANY SOURCES LISTED, SKIP TO NEXT MODULE.]

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? School-operated venues exclude those that are operated by the school food service. Please include sales from vending machines, snack bars, and other school-operated venues. You may need to consult with someone who oversees these venues to answer this question. (Check one response for each food.)

Food category	This food not offered in 2007-2008 or now	More of this food since 2007-2008	About the same amount of this type of food	Less of this type of food since 2007-2008	Stopped offering this food after 2007-2008
100% fruit juice or 100% vegetable juice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Soda pop or fruit drinks that are not 100% juice	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports drinks, such as Gatorade®	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bottled water	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Whole or 2% fat milk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1% or skim milk	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fruit	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Bread sticks, rolls, bagels, pita bread, or other bread products	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low-fat cookies, crackers, cakes, pastries, or other low-fat baked goods	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cookies, crackers, cakes, pastries, or other baked goods that are not low in fat	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Low-fat or nonfat yogurt	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Lettuce, vegetable, or bean salads	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Vegetables with low-fat dip	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

what about

A la carte

lenses

09-10

A lot of
for many years
have

FFVP module

F2. The FFVP encourages development of partnerships with non-Federal entities. Does your school on its own maintain relationships with any outside partners as part of the FFVP? Do not include district-wide partnerships.

F2a. Please check all partnerships that apply for your school.

- Produce for Better Health
- Healthcare providers, including hospitals and clinics; doctors, nurses, nutritionists, dietitians/dietetic interns, or other clinicians
- Community Health Agencies
- City, County, State, or Tribal government agency (e.g. health departments, agriculture departments, etc.)
- Cooperative Extension Service
- Local grocers and stores, farmers' markets, or other food distributors
- Vocational clubs
- Produce associations/commodity groups
- Nutrition trade associations (e.g. American Dietetic Association, School Nutrition Associations)
- Health associations (e.g. State or National affiliates of the American Cancer, Diabetes, or Heart Associations)
- Universities, colleges, or other higher education institutions
- Community action agency, food bank, or other community/fairth-based organization
- Other (specify):

Need to broaden scope partnerships
state level
other agencies
health

Apply other
Food Programs
collaborations

F2

same additions

approve about

0. Finally, we would like to ask you about your opinions of the Fresh Fruit and Vegetable Program. For each statement, please tell us whether you agree or disagree.

1.	The students in my school like to eat the fruit and vegetable snacks offered at school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
2.	I wish more of the students in my school ate the fruit and vegetable snacks offered at school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
3.	I think that students eat more fruits and vegetables at school on days when they are offered as a snack at school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
4.	I think that students eat fewer unhealthy snacks at school on days when fruits and vegetables are offered as a snack at school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
5.	The fruit and vegetable snacks should be offered more often (for example, on more days or more times during the day).	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
6.	The fruit and vegetable snacks offered at my school are good quality.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
7.	I am satisfied with the variety of different kinds of fruit and vegetable snacks offered at my school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
8.	I would like the Fresh Fruit and Vegetable Program to continue to be offered at my school.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
9.	Overall, my opinion of the Fresh Fruit and Vegetable Program is favorable.	<input type="checkbox"/> 1 Agree Strongly	<input type="checkbox"/> 2 Agree Somewhat	<input type="checkbox"/> 3 Disagree Somewhat	<input type="checkbox"/> 4 Disagree Strongly	<input type="checkbox"/> 5 Don't know
10.	If I could change one thing about the fruit and vegetable snack program it would be:	[respon]				

We should offer daily

*more of
fresh fruit capture*

*add question
my students are benefiting
from the program spots*

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 well-presented, 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 FFVP-participating (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.b should read, "An additional sheet is provided...if you have more than **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				REVISION	
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. <u>Suggestion:</u> add a 3rd goal: determine the reach or coverage of the FFVP. <u>Rationale:</u> 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) <ul style="list-style-type: none"> • 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?	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 sample 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 self-administered 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 (CDC)	For the Impact study: I understood that <u>eligible schools that participated in FFVP</u> will be compared <u>will other eligible schools that did participate</u> . Is this correct?		Clarified in OMB package
		Joe Thompson (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	
Issue	Item	Reviewer	Comments	FNS	Abt
	"State Cutoff" pg. 17	Sonia Kim (CDC)	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 <u>above and below the cut-off for funding.</u> "		Clarified in OMB package
	"State Cutoff"	Sonia Kim (CDC)	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.		Clarified in OMB package
	"State Cutoff"	Sonia Kim (CDC)	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.		Clarified in OMB package
	"State Cutoff" pg. 19	Sonia Kim (CDC)	The definition of "State Cutoff" should be made clearer in the diagram on pg. 19.		Clarified in OMB package
Impact Data	Nutritional Status pg. 4	Sonia Kim (CDC)	On pg. 4, it states that the impact study will look at children's nutritional status. Is this information being collected?	No	No. wording changed.
	Willingness to try new fruits and vegetables pg. 8	Sonia Kim (CDC)	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.)	Yes (agree w/importance)	Additional questions have been added to the student questionnaire on willingness to try, and preferences for particular fruits and vegetables
	Increased fruit and vegetable consumption pg. 8	Sonia Kim (CDC)	Pg. 8 states that the information will be used to determine whether "...the FFVP increased fruit and vegetable consumption..."		Text changed to suggested text.
Comparability of the Proposed Instruments		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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.		SNDA III and earlier FNS studies were reviewed in instrument development. School environment instrument has been used in previous CWH studies.
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	We urge them (Abt) 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).		FFVP schools are by definition atypical; comparisons to the general population of schools are not a stated priority for the evaluation. Relevant comparisons are between FFVP schools and eligible non-participating schools. We did not have time to review the BTG instruments and still meet our schedule.
Problems of response rate, missing data, and age inappropriate questions		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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.	Yes (agree)	Instruments have been simplified to reduce burden. This issue will be revisited after the pretest.

FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)					
DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	<u>Response rate for administrators</u> will be a serious problem <u>even if</u> the surveys are made more user friendly. The incentives described will <u>not</u> 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 <u>in detail</u> , how Abt plans to follow up with administrators and food service personnel to get them to respond.		Incentives will be reassessed after the pretest.
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	<u>The instruments for children</u> 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.	FNS will obtain instruments	Memo prepared addressing this concern. Methods used successfully for many years. Pilot showed reasonable quality data from children grades 4-6 and high response rate 10/11.
Greater analytic attention, and data collection where possible, to consumption of less nutritious foods	Background Section	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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 <u>only</u> 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, 7th page. Regardless of decisions about the self-administered instrument, analytic questions about this issue, as seen on 7th page of Exhibit A-2, should take higher priority! Unlike data collection, adding another analysis costs very little, and could tell us so much.		Memo addressed this issue. No valid questionnaire for this age group but selected questions on FQ snack foods and beverages from BSQ- 24 hr data will give better estimates for the group on intake of these foods than any FFQ
General Comments	pg. 1 & 2	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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.		Overall goals and objectives clarified
	pg. 3	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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 (reach/coverage issue- within schools).	Yes	See above (row 8)
	pg. 6	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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!		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.
	pg. 7	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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.		See memorandum on dose response analysis.

FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)					
DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Lorelei DiSogra (UJFPA)	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 Topic Area 2	Laura Leviton and Punam Ohri-Vachaspati (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 (last page)	Laura Leviton and Punam Ohri-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 FFVP	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 Leviton and Punam Ohri-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 Leviton and Punam Ohri-Vachaspati (RWJF)	The self administered survey and the food diary for 4 th – 6 th graders included in the package seem quite advanced and beyond the reading and comprehension levels of many 4 th and 5 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 Leviton and Punam Ohri-Vachaspati (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 intake.

FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)					
DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	Respondents for SFA's and School Food Managers may be the same individual in many small to medium school districts.	Yes	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.
		Lorelei DiSogra (UFPA)	Important to obtain monthly FFVP menus--this will provide information on variety of fruits and vegetables being offered. Important to know if they are having problems with offering variety since some may have a negative perspective on vegetables.	Yes	Cycle of menus will vary. We will obtain 3 months of detail on food purchases from FFVP school in the impact sample. All sample SFAs will be asked both what they offered in the reference week and what other F/V they offered during the year.
		Lorelei DiSogra (UFPA)	Want to capture who the "champion" is for the program, who is driving it? This is important because it varies from school to school and can impact implementation.	Yes	Question added to State survey.
			Is there a "champion", and why was that person chosen? As an open-ended question.	Yes (Can list in report as opposed to analyzing)	Re: "why" - Not feasible to collect consistent and usable responses with a self-administered web survey. Interviews would be needed; not in scope
		Lorelei DiSogra (UFPA)	Principals and Superintendents know all about the benefits the FFVP has on the school environment and students. There is no survey for the Superintendent which is usually one of the champions or driving forces for the program.		
		Guenther, Patricia (CNPP)	recommendations for fruit and vegetable intake are no longer expressed in terms of "servings", but rather in "cups."	Yes	Will be reported appropriately in analysis.
		Sonia Kim (CDC/DNPA O)	Not enough information on Waste : How much of the purchased food is being thrown away by the food service staff? This question should be asked at least of the School Foodservice Manager and School Food Authority Director. If possible, perhaps some observations of students could be added. A question could be added to the Self Administered Student Questionnaire (see detailed comments).		Questions added to SFA, principal, and school FS manager surveys
		Sonia Kim (CDC/DNPA O)	Not enough information on Staff burden : In a lot of schools, foodservice staff is being cut and have more than their share and cannot handle the load they currently have. Information should be collected from the School Foodservice Manager, the School Food Authority Director, and the School Principal. Related, what unmet needs are being communicated by the foodservice workers, the principal, or the district (e.g. training, supplies, better source of fruits and vegetables?)		Abt has added several questions to the SFA Survey, the Principal Survey, and the school FS manager to assess the degree to which the FFVP represents a burden on school or district staff
		Sonia Kim (CDC/DNPA O)	Not enough information on Distribution process : This information is asked in the "SFA Survey" and thus I think at the district level. It will be answered separately for each school, but the Principal and School Foodservice Manager may have more accurate information. In addition, each of them should be asked about their satisfaction with the distribution method.		SFA survey instructions clarified so R's know to consult with school-level personnel if needed. Principal survey includes Q on adequacy of kitchen facilities.
PARENT SURVEY					
Outside Reviewer Comments					

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

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
	Q6	Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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					
	Section A, Q1	Laura Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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	
Issue	Item	Reviewer	Comments	FNS	Abt
	Section B	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	Section B – similar comments as in Section A.	Yes	DONE
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (RWJF)	Page 9 – Q 17 typo – replace fruit with vegetable.		DONE
	pg. 10, QD1	Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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)

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
	pg. 9	Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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
	pg. 9, Q3 and 4	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 fruit and/or vegetable you serve in school lunch? Has the FFVP resulted in student 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)

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
	Q29	Lorelei DiSogra (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 Leviton and Punam Ohri-Vachaspati (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".	Yes	2 questions added

FOOD DIARY

Outside Reviewer Comments					
		Laura Leviton and Punam Ohri-Vachaspati (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 th and 5 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 Leviton and Punam Ohri-Vachaspati (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 Guide- Soda/Sparkling Water	CDC/DASH	Where to include vitamin water?		DONE

SELF-ADMINISTERED STUDENT QUESTIONNAIRE

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

DRAFT OMB PACKAGE

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	Many of the questions in this instrument seem much more complex and advanced than the comprehension and reading level of many 4 th and 5 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 comments- YRBS 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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (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	CDC/DNPA O	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	CDC/DNPA O	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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	For N1 – have to say nutrition education or promotion activities occurred at SCHOOL during the week <u>for at least some classes</u> ..		We considered this comment and left the question as worded.
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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)

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 – <i>those that are not run by school food service</i> ?		We considered this comment and left the question as worded. If there is confusion in the pretest, we will clarify.
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
		Laura Leviton and Punam Ohri-Vachaspati (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 Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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.
	pg. 3, N2c & pg. 4, N3	CDC/DNPA O	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	CDC/DNPA O	"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)					
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	
		Lorelei DiSogra (UFPA)	Start survey with QO, so that it begins with a focus on FFVP, the other questions seem tedious.		See response above	
	pg. 1	Lorelei DiSogra (UFPA)	I think principals will have trouble answering this level of detail about nutrition education.	Yes	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.	
	Q. N6	Lorelei DiSogra (UFPA)	Too limiting. What about whole grains, more f&v	Yes	List of messages expanded.	
	Q. N7	Lorelei DiSogra (UFPA)	Nothing about wellness policies...changes in teacher's lounge, birthday parties, holiday parties....impact of FFVP on wellness policies (nutrition/physical activity)	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.	
	Q. C1	Lorelei DiSogra (UFPA)	Will they know this? Level of detail requires asking someone else.		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.	
	Q. C2	Lorelei DiSogra (UFPA)	What about a-la-carte lines? 2007-2008 is too many years back.		A la carte lines are part of cafeteria and are run by food service. 2008-09 is too late for baseline because some schools will have had FFVP. We need a consistent baseline. We will see in the pretest if recall is a problem.	
	Q. F2	Lorelei DiSogra (UFPA)	Needs to be broader to capture all partnerships--other State Agencies--Ag, Health & other Fed programs for collaborations.	Yes	We avoid duplication by asking about state-level partnerships in State survey, district-level partnerships in SFA survey, and school level partnerships here.	
	Q. O5	Lorelei DiSogra (UFPA)	We should offer daily	FNS noted comment	No response required.	

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 DiSogra (UFPA)	Add question (not legible)	FNS will ask Lorelai	
		Lorelei DiSogra (UFPA)	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 Leviton and Punam Ohri-Vachaspati (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 administration 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 Leviton and Punam Ohri-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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (RWJF)	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. <u>It is our experience that these individuals report average meals per day</u> 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 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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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	CDC/DNPA O	Add "Source of fruits and vegetables"	What can be done to get at local sources from 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	CDC/DNPA O	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
	pg. 1	Lorelei DiSogra (UFPA)	To assess variety--ask for FFVP monthly/yearly menus. Many of these SFA staff are very involved in implementation of FFVP, select all FF&V, teaching nutrition ed, marketing the FFVP to other schools, etc...	Yes	Cycle of menus will vary. We will obtain 3 months of detail on food purchases from FFVP school in the impact sample. All sample SFAs will be asked both what they offered in the reference week and what other F/V they offered during the year.
	pg. 1, F	Lorelei DiSogra (UFPA)	Opening paragraph doesn't make sense		Questionnaire has been revised with clearer instructions.
	F2	Lorelei DiSogra (UFPA)	"Fruit and Vegetable distribution methods"--what does this mean? Not clear to me.		Added examples of distribution methods (e.g. kiosks, classroom) to clarify this point.
	F3	Lorelei DiSogra (UFPA)	This question needs to also include State government partners and other federal programs. Not capturing full picture.	Yes	We avoid duplication by asking about state-level partnerships in State survey, district-level partnerships in SFA survey, and school level partnerships here. We expect partnerships with federal agencies to occur at the state level.
	F4a & F4b	Lorelei DiSogra (UFPA)	change "promoted" to provided/served and add another question "...within the next few weeks."		Language has been changed to respond to this request.
	F5	Lorelei DiSogra (UFPA)	Include "f. Our SFA has other eligible schools that would like to participate in FFVP."	No- this raises a different issue	
	M2a & M2b	Lorelei DiSogra (UFPA)	Remove "dried" under vegetables category		Will do after pretest.
	M2d	Lorelei DiSogra (UFPA)	Suggest this question be clearer		Wording for colum headings has been changed to clarify intent.
	M5	Lorelei DiSogra (UFPA)	Place "FF/V" before the word "snacks" in the opening paragraph and under "a".		We will revise if needed based on pretest feedback.
	S1	Lorelei DiSogra (UFPA)	Need to define kiosk		Definition has been added.
	S4 & S5	Lorelei DiSogra (UFPA)	Make sure to put "Fresh" before "fruits or vegetables" in opening paragraph. Replace "distributed" with "offered/provided/served"		We will revise if needed based on pretest feedback.

FNS Evaluation of the Fresh Fruit and Vegetable Program - Reviewer Comments (OVERALL)					
DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
	S4	Lorelei DiSogra (UFPA)	What ? best describes? This ? changes in all surveys? (not legible)		
		Lorelei DiSogra (UFPA)	What about series of questions about/capturing was this FF/V new to students. First time trying/their response.		Not identified as a research priority; not advisable to lengthen instrument.
	S6	Lorelei DiSogra (UFPA)	Do we need this questions?		Useful to understand reasons for choices of foods offered; could drop to cut burden.
	S6	Lorelei DiSogra (UFPA)	Change "distribution" to "Program"		"Distribution" used to link to preceding questions; "program" is broader and could be interpreted to refer to promotion activities etc.
	S6a	Lorelei DiSogra (UFPA)	add an option: Some new FF&V offered this week. (One issue not identified is that many don't know about wide variety available...even apples--value added, etc...	Yes	Not identified as a research priority; not advisable to lengthen instrument.
	O	Lorelei DiSogra (UFPA)	I don't think this question should be last.		Question is no longer placed last in instrument.
	O Q2	Lorelei DiSogra (UFPA)	What is the point? Ate or participated?		Focus is what they eat.
	O Q8	Lorelei DiSogra (UFPA)	Need to clarify question		We will revise if needed based on pretest feedback.
	O	Lorelei DiSogra (UFPA)	This list needs to be expanded to capture other positive/negative opinions		Questions have been expanded. Questions on application process and challenges added.
		Lorelei DiSogra (UFPA)	Other possible questions: How involved are you in the implementation of the FFVP in schools in your district? What role do they play?		Not identified as a research priority; not advisable to lengthen instrument.
STATE CHILD NUTRITION AGENCY SURVEY					
Outside Reviewer Comments					
		Laura Leviton and Punam Ohri-Vachaspati (RWJF)	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.	Yes	Grade levels of schools in sample will be identified from CCD.

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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (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 Leviton and Punam Ohri-Vachaspati (RWJF)	In question 12 give examples for options like Implementation plans, nutrition education (may want to include things like number of hours and frequency, partnerships)		We will revise if needed based on pretest feedback.
	Q16	Laura Leviton and Punam Ohri-Vachaspati (RWJF)	Question 16 might consider adding promotional materials and education materials as options		We will revise if needed based on pretest feedback.
	pg. 9	CDC/DNPA O	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	CDC/DNPA O	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	CDC/DNPA O	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)

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

DRAFT OMB PACKAGE				REVISION	
Issue	Item	Reviewer	Comments	FNS	Abt
	F4	CDC/DASH	Are you referring to the F3 period?		Yes - reference clarified
	Q11	Lorelei DiSogra (UFPA)	Add questions: g) Less schools applied for the FFVP than the SA expected; h) Do all eligible schools know about the availability of FFVP; i) Is the SA satisfied w/the # of school applications for FFVP received	Yes, to the concept, not the wording	Questions included (Q10, q11)
	Q12	Lorelei DiSogra (UFPA)	"Serving fruits and vegetables"--frequency-times per week of offering FFVP (times/wk).		"Distribution methods, time of day, portion sizes"
	Q13a	Lorelei DiSogra (UFPA)	Goal setting to reach # of F/V servings recommended by DG's	Yes	Covered by "role of ffv in complete diet"; also a topic more suited to adults or teens than elementary students.
	Q14	Lorelei DiSogra (UFPA)	feedback to schools to improve implementation	Yes	Feedback would be part of listed activities.
	C Q15	Lorelei DiSogra (UFPA)	Expand question to include other State agencies (Ag/Health) that may be federally in-State funded to capture full picture.	Yes	Covered by " City, County, State, or Tribal government agency (e.g. health departments, agriculture departments, etc.)"
	C Q15a	Lorelei DiSogra (UFPA)	Include produce companies/produce growers/farmers		We will revise if needed based on pretest feedback.
	Q18	Lorelei DiSogra (UFPA)	Include types of F/V served/offered each month.	Yes	Captured by " Food purchase cost detail by item or category" but could add this as separate category for states that get menus but don't get/save detail of food costs by food item.
	F4	Lorelei DiSogra (UFPA)	Does this apply to applications for school year 10-11?		Yes - reference clarified
	F5	Lorelei DiSogra (UFPA)	Add same questions suggested in Q11		Same Q asked for both years.

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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.
4. 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.
5. 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.
6. 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.
7. 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



Abt Associates Inc.

memorandum

Social and Economic Policy

Date 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 (2×3). Also, the results would be strictly descriptive.

It is not that subgroup analyses per se are difficult or impossible. The difficulty is with process-based 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.



Abt Associates Inc.

memorandum

Social and Economic Policy

Date October 20, 2009

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 8th 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 meals¹;
- (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.

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.

Exhibit 1: Planned Comparisons of Participant and Nonparticipant Schools						
	All elementary schools that are ...					
	In State (1)	Eligible (2)	In districts which have eligible applicants (3)	Eligible applicants (4)	In districts which have FFVP participants (5)	FFVP participants (6)
Percent free/reduced price, on applications	NA	NA	NA		NA	
Percent free/reduced price, in CCD						
Demographic characteristics, from CCD						
School characteristics, from CCD						

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.