**Memorandum**

**Date: December 20, 2010**

**To: Julie Wise, OMB Desk Officer, Food and Nutrition Service**

**Through: Rachelle Ragland Green, Food and Nutrition Service, Information Clearance Officer; Ruth Brown OCIO Desk Officer**

**From: Alicia White, Senior Nutritionist, Child Nutrition Division**

 **USDA – Food and Nutrition Service**

**Re: Under Approved Generic OMB Clearance No. 0584-0524**

**Request Approval to Perform Formative Research –**

**FNS *“What You Can Do for School Wellness”* Messages and Communications Tools Testing**

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The Food and Nutrition Service (FNS) of the USDA Food, Nutrition and Consumer Services is requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0524.

This request is to acquire clearance for the testing of messages and a series of communications tools to support and assist with the creation of a healthy school nutrition and physical activity environment in middle schools in the United States. We will complete this research in two phases; round one is scheduled for January 2011 (formative round), and round two in May 2011 (evaluative round). This package addresses the formative round of research. As it relates to testing stimuli and associated handouts, this package includes final versions of formative testing stimuli. We will submit a similar request, as well as the associated draft screeners, guides, and testing stimuli, for the evaluative round as well, which is scheduled to be conducted in May 2011.

The following information is provided for your review:

1. **Title of Project**: FNS “*What You Can Do for School Wellness”* Messages and Communications Tools Testing
2. **Control Number**: 0584-0524
3. **Public affected by this Project**: Individuals/Households and State, Local/Tribal Employees
* Parents of middle school students (grades 6-8) that attend a school participating in the National School Lunch Program. One-third of parents will also reside in a household whose income falls at or below 185% of the Federal poverty line.
* Middle school students (grades 6-8) who attend a school participating in the National School Lunch Program. One-third of students will also reside in a household whose income falls at or below 185% of the Federal poverty line.
* Parents of students (grades 6-8) will respond to questions on the screener for their children (see previous bullet), and will sign parental consent and Agreement on Security of Comments forms.
* Middle school teachers (grades 6-8) employed by a school participating in the National School Lunch Program. Teachers will not be physical education or health teachers.
* Middle school principals (grades 6-8) employed by a school participating in the National School Lunch Program.
* Middle school food service managers (i.e., individuals who manage the cafeteria for their schools) (grades 6-8) employed by a school participating in the National School Lunch Program.

See the Methodology/Research Design section for an outline of the number of focus groups for each audience. Research will be conducted only with English-speaking audiences. Although FNS notes that nutrition messages communicated in Spanish would be useful for parents, currently resources are insufficient to develop and test messages and supporting content in both English and Spanish.

1. **Number of respondents**:

***Screener\****

|  |  |
| --- | --- |
| **Target audience** | **Number of Persons – Formative Round****(January 2011)** |
| Middle School Students Participants | 864 |
|  Parents of Student Participants | 864 |
| Middle School Parent Participants | 864 |
| Middle School Teachers | 504 |
| Food Service Managers\*\* | 540 |
| Middle School Principals\*\* | 540 |
| Total | 4,176 |

\*Includes non-responders. Generally, for every 12 respondents, 11 will not complete the entire screener (may terminate after introduction or after one of the other questions). For specialized audiences such as principals and food service managers, for every 20 respondents, 19 will not complete the entire screener.

***Focus Groups\****

|  |  |  |  |
| --- | --- | --- | --- |
| **Target audience** | **Number of groups** | **Number of participants per group** | **Total number of participants** |
| *Middle School Students* |
|  Formative Round (January 2011) | 6 | 6 | 36 |
| *Middle School Parents* |
|  Formative Round (January 2011) | 6 | 6 | 36 |
| *Middle School Teachers* |
|  Formative Round (January 2011) | 3 | 8 | 24 |
| *Food Service Managers* |
|  Formative Round (January 2011) | 3 | 6 | 18 |
| *Middle School Principals* |
|  Formative Round (January 2011) | 3 | 6 | 18 |
| Total | 21 | N/A | 132 |

\*Groups with middle school students and parents will recruit 12 to seat 6. Groups with principals and food service managers will recruit 9 to seat 6. Groups with teachers will recruit 14 to seat 8.

5. **Time needed per response**:

***Time Needed Per Screening Questionnaire\****

|  |  |  |
| --- | --- | --- |
| **Target audience** | **Time (minutes)** | **Time (hours)** |
| Middle School Student Participants  | 5 | 0.08 |
|  Parents of Middle School Student Participants | 5 | 0.08 |
| Middle School Parent Participants | 10 | 0.17 |
| Middle School Teacher Participants | 10 | 0.17 |
| Food Service Manager Participants | 10 | 0.17 |
| Middle School Principal Participants | 10 | 0.17 |

\*The time per response is an average of the response per respondent. Respondents may be terminated by FNS due to the response to a question or respondent may choose to terminate at any point during the screening (before the first question, after the introduction or at the end of the screener).

***Time Needed Per Focus Group***

|  |  |  |
| --- | --- | --- |
| **Target audience** | **Time (minutes)** | **Time (hours)** |
| Middle School Students  | 60 | 1 |
| Middle School Parents | 120 | 2 |
| Middle School Teachers | 120 | 2 |
| Food Service Managers | 90 | 1.5 |
| Middle School Principals | 90 | 1.5 |

1. **Total Burden Hours on Public**:

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  (a) Affected Public | Respondent Type | (b) Survey Instruments | (c) No. Respondents | (d) Frequency of Responses | (e) Est. Total Annual Responses per Respondent  (c **x** d) | (f) Hours Per Response | (g) Total Burden Hours (e **x** f) |
| **Reporting Burden**  | **Formative Round** | **(Jan 2011)** |   |   |   |   |   |
| **Individuals & Households** | Middle School Students |  Screeners Questionnaire | 864.00 | 1.00 | 864.00 | .08 | 69.12 |
| Middle School Students | Focus Group | 36.00 | 1.00 | 36.00 | 1.00 | 36.00 |
| Middle School Students’ Parents | Screeners, Parental Consent FormAgreement on Security of Comments | 864.00 | 1 | 864.00 | .08 | 69.12 |
| Middle School Parents |  Screeners Questionnaire, Agreement on Security of Comments | 864.00 | 1.00 | 864.00 | .17 | 146.88 |
| Middle School Parents | Focus Group | 36.00 | 1.00 | 36.00 | 2.00 | 72.00 |
| Middle School Teachers | Screeners Questionnaire, Agreement on Security of Comments  | 504.00 | 1.00 | 504.00 | .17 | 85.68 |
| Middle School Teachers | Focus Group | 24.00 | 1.00 | 24.00 | 2.00 | 48.00 |
| Food Service Managers | Screeners Questionnaire, Agreement on Security of Comments | 540.00 | 1.00 | 540.00 | .17 | 91.80 |
| Food Service Managers | Focus Group | 18.00 | 1.00 | 18.00 | 1.5 | 27.00 |
| Middle School Principals | Screeners Questionnaire, Agreement on Security of Comments | 540.00 | 1.00 | 540.00 | .17 | 91.80 |
| Middle School Principals | Focus Group | 18.00 | 1.00 | 18.00 | 1.5 | 27.00 |
| **Total** |  |  |  **4,308.00** |   |  **4,308.00** |   |  **764.40** |

\*Includes burden for those answering none or part of the questions. See narrative under 4-6.

\*\*Includes burden for completing an Agreement on Security of Comments (i.e., confidentiality agreement), parental consent form and all handouts.

1. **Project Purpose, Methodology and Design**:

###### Background

FNS administers the nutrition assistance programs of the United States Department of Agriculture (USDA). The mission of FNS is to provide children and needy families better access to food and a more healthful diet through its nutrition assistance programs. Among these programs are the Child Nutrition Programs, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP). The Child Nutrition Programs provide nutritionally balanced, low-cost or free meals and snacks. Team Nutrition is an FNS initiative that supports the Child Nutrition Programs through training and technical assistance for foodservice, nutrition education for children and their caregivers, and school and community support for healthy eating and physical activity.

Through the Team Nutrition initiative, FNS sponsors the HealthierUS School Challenge which is a voluntary national certification that recognizes schools across the nation who promotes good nutrition and physical activity. The HealthierUS School Challenge is a key component of the First Lady’s *Let’s Move!* campaign to end childhood obesity within a generation. Award winning schools provide nutrition education, nutritious food and beverage choices, physical education and opportunities for physical activity for their students.

To help identify resources schools need to create healthier nutrition and physical activity environments, USDA convened a Healthy School Environment Workgroup in 2009. The Workgroup included experts in the fields of nutrition and physical activity as well as teachers, school administrators, school nutrition professionals and parents. The Workgroup communicated a need for materials that address *“What You Can Do for School Wellness”* with individual calls-to-action and content specifically designed for the many target audiences who can facilitate change at the school community level (e.g., teachers, parents, administrators).

The messages and materials that are developed and tested in this research effort will provide needed resources that help motivate teachers, parents, school administrators, school food service and students to support and assist with the creation of a healthy school nutrition and physical activity environment. Messages will be consistent with the *Dietary Guidelines for Americans* and support school efforts to become HealthierUs School Challenge award winners.

Purpose

The purpose of the proposed research is to obtain feedback from middle school teachers, parents, school administrators, school food service managers and students on specific nutrition and physical activity messages and supporting content that will be used in FNS’ nutrition assistance programs serving these audiences. Specifically, these messages and supporting content will focus on motivating the target audiences to support and assist with the creation of a healthy school nutrition and physical activity environment in communities in which they reside, with their middle schools as the foundations for these efforts.

Qualitative research will verify that the developed messages and supporting content are clear, credible, actionable, relevant, useful to the intended audience -- and ultimately, that the messages and supporting content compel audiences to take action.

###### Methodology/Research Design

FNS will conduct two rounds of qualitative research. The tables below outline the research design, and the subsequent sections outline the approach in more detail. All groups (both in person and telephone) will be conducted *after* school hours.

|  |  |
| --- | --- |
| **Target audience** | **Research Methodology** |
| ***Formative Round (January 2011)*** |  |
| Middle School Students  | 6 mini-groups (n=36) |
| Middle School Parents | 6 mini-groups (n=36) |
| Middle School Teachers | 3 focus groups (n=24) |
| Food Service Managers | 3 telephone focus groups (n=18) |
| Middle School Principals | 3 telephone focus groups (n=18) |

**Formative**: The first round of research will test messages and supporting content that help motivate the target audiences to support the creation of a healthy school nutrition and physical activity environment in their schools.

The use of a focus group research design in this formative round allows for in-depth exploration of key motivations and barriers to compelling action around these topics. This approach also allows the Agency to capitalize on the small group dynamics to generate new insights regarding motivators, attitudes and perceptions that influence dietary and physical activity practices of the target audiences. In-person focus groups will be the methodology used for parent, student and teacher audiences.

Given the unique perspectives middle school principals and food service managers provide, it is paramount to include them in this research process. However, there are limited numbers of these individuals in some locations. Therefore, to gather these perspectives and maximize the geographic diversity of these audiences, telephone focus groups will be employed.

Telephone focus groups allow the recruitment of individuals from across the country. And, they are led similarly to in-person focus groups—a professionally-trained moderator guides participants through the discussion to glean information about the messages and materials associated with this effort. To evaluate materials, these are either sent in sealed envelopes before the sessions begin, or they are distributed via the Internet during the groups so that respondent can review and respond to them.

In addition to messages, we will also test supporting content. Supporting content is defined as information that complements the healthier school environment messages by offering additional tips, advice, strategies, and encouragement to facilitate the intended behavior change. Specifically, we will test supporting content developed to complement the messages included in testing.

Finally, discussions will also be designed to gather information from all audiences to inform development of communication tools that can convey the key messages and supporting content in an engaging way. Based on this feedback, communication tools (handouts and videos) will be developed to be tested in the evaluative round, described below.

The formative focus group Moderator’s Guides (Attachments F-J) will serve as a tool to guide the group conversation during the discussion sessions.

**Evaluative**: The second round of research will determine whether the communication tools (handouts and videos) are clear, relevant, actionable and compelling for the target audiences and provide insights that will allow the Agency to enhance these resources as needed to meet its aforementioned goals. Specifically, in this second round of research, we will:

* Test handouts designed to convey the relevant messages and supporting content for each audience. The tools will be developed based upon input gathered in the initial formative round.
* Test video clips designed to convey the relevant messages and supporting content for each audience. The tools will be developed based upon input gathered in the initial formative round.

As noted above, we will submit a separate package (with screeners, guides, and draft testing stimuli) for approval before conducting these sessions. We are hoping to conduct them in May 2011.

The in-person research among middle school students, parents, and teachers will span at least six cities across the United States in order to maximize the geographic and ethnic diversity of participants. The telephone focus groups among food service managers and principals will be recruited to provide such diversity *within* each session. The following table details the specific breakout of the focus groups to be conducted by round:

|  | **Middle** **School Students** | **Middle School Parents** | **Middle School Teachers** | **Middle School Food Service Managers** | **Middle School Principals** |
| --- | --- | --- | --- | --- | --- |
| **Formative Round***Cities:** *Baltimore, MD*
* *Cleveland, OH*
* *Riverside, CA*

12 mini-groups3 focus groups6 telephone groups | 6 Mini-groups(2 per city) | 6 Mini-groups(2 per city) | 3 Focus groups(1 per city) | 3 Phone groups | 3 Phone groups |
| **Evaluative Round***Cities:** *Atlanta, GA*
* *Des Moines, IA*
* *Dallas, TX*

12 mini-groups3 focus groups6 telephone groups | 6 Mini-groups(2 per city) | 6 Mini-groups(2 per city) | 3 Focus groups(1 per city) | 3 Phone groups | 3 Phone groups |

###### Design/Sampling Procedures

The sample will include five different audiences, as noted above. The mini-groups of middle school students will consist of children in grades 6-8 who are attending a school that participates in the National School Lunch Program. One-third of the student sample will reside in a household whose income falls within 185% of the poverty line. Only students that speak English and feel comfortable reading English will be recruited. To minimize respondent posturing within groups, sessions among students will be segregated by gender and will limit the number of children who attend the same school to no more than two. Groups will contain a mix of races/ethnicities to ensure representation that approximates demographics of persons participating in FNS programs in each geographic area (to the extent possible). Students will be screened for their level of involvement in school clubs, sports teams, student government or other school activities. We believe this segmentation will be important since the messages and materials will be designed to motivate individuals to action and make their school a healthier environment. The types of individuals most likely to respond to our messages will be those who have show active involvement in their school communities.

Parents of middle school students (grades 6-8) will also be recruited for mini-groups. Parents will currently have a child attending a school that participates in the National School Lunch Program. At least one-third of the parent sample will reside in a household whose income falls within 185% of the poverty line. Only parents that speak English and feel comfortable reading English will be recruited. Groups of parents will be segregated by gender. Groups will contain a mix of races/ethnicities to ensure representation that approximates demographics of persons participating in FNS programs in each geographic area (to the extent possible). Parents will also be screened for their level of involvement in their child’s education (e.g., member of PTA, school wellness council, and/or other youth-oriented activities through the school or another community organization such as a church youth group or extracurricular sports). We believe this segmentation will be important since the messages and materials will be designed to motivate individuals to action and make their school a healthier environment. The types of individuals most likely to respond to our messages will be those that have illustrated some activity in their child’s school or extracurricular community.

Middle school teachers (grades 6-8) will be recruited for full groups. The sample will include teachers who are currently employed by a school that participates in the National School Lunch Program. Only teachers that speak English and feel comfortable reading English will be recruited. Groups will contain a mix of races/ethnicities as well as gender to ensure representation that approximates demographics of persons employed in education (to the extent possible). Teachers will also represent a mix of tenure with both younger teachers and those with many years of experience. The groups will contain a mix of teachers who specialize in different academic subjects (e.g., Math, Science, History). We will not recruit teachers who currently teach health, work/family studies, cooking/home economics or physical education.

The sample will also include middle school principals and food service managers. All principals and food service mangers will be employed by a school that participates in the National School Lunch Program. Only principals and food service managers that speak English and feel comfortable reading English will be recruited. Groups will contain a mix of races/ethnicities (to the extent possible). All recruits will have been employed in their position for a minimum of six months. To maximize geographic diversity, groups with principals and food service managers will take place via telephone. Recruits will be screened to represent five different regions (Northeast, Mid-Atlantic, Southeast, Southwest and West).

It is also important to note that screening will ensure that no individuals who participate in these sessions are affiliated with a school that has already won a HealthierUS School Challenge Award (HUSSC award). The screeners for these sessions are located in Attachments A-E.

Site Selection

The formative sessions, scheduled for January 2011, will be conducted in three cities— Baltimore, MD, Cleveland, OH and Riverside, CA. All respondents will be of different families. The sites for formative research testing were chosen because they represent three geographically different areas of the country (Mid-Atlantic, Mid-west and Southwest) and include both urban (Baltimore and Cleveland) and less urban (Riverside) locations. These locations were also chosen because market research firms are available in these cities with access to databases from which a diverse sample of respondents can be recruited.

The May 2011 focus groups will be conducted in three cities—Atlanta, GA, Des Moines, IA, and Dallas, TX. These sites were chosen because they also represent three geographically different areas of the country (Southeast, Mid-West, Southwest) and include both urban (Atlanta and Dallas) and less urban locations (Des Moines), and market research firms are available in these cities with access to databases from which a diverse sample of respondents can be recruited.

Recruitment of Participants

Professional focus group recruitment facilities in each location will identify and screen potential participants for the testing using a random selection technique from their databases of area residents willing to participate in research. These focus group facilities develop their databases by placing ads in local papers and using community events and local resources to recruit respondents. Then, facilities will call individuals from their databases that are most likely to meet the criteria identified for participation for a specific project. Facilities will obtain specific demographic information on the individuals who agree to participate to make the recruiting process more efficient. For this effort, we are partnering with facilities who have a long track record of quality recruits (i.e., have quality databases). Moreover, the use of the focus group facilities’ databases of people interested in participating in focus groups minimizes the need to “cold-call” individuals for participation thereby reducing recruitment costs.

Screener Guides (Attachments A-E) will be used to ascertain that participants are representative of those participating in or eligible for FNS programs and to identify participants. These Screener Guides cover all questions to be used in the selection process. To recruit participants for the focus groups with middle school students, the interviewer will use the recruitment Screener Guide (Attachment A) with the parent and the child to determine that participants meet the eligibility criteria and to obtain parental and child consent to participate in the focus group.

Participants will receive a cash stipend ranging from $75.00 - $100.00 for adults and $50.00 for parent escorts of participating children to reimburse for expenses such as transportation and childcare costs. The child participants themselves are not receiving any stipends (see table below). The selection of these amounts comes from the recommendations received directly from the focus group facilities that are recruiting and hosting the groups in each city. There are several factors that determine the amount offered to participants. As background, amounts are driven by a facility’s ability to guarantee show rates. These show rates, or the rates at which respondents will “show” for research events, are tracked over time. Once show rates fall beneath the accepted industry average, facilities are forced to increase the incentive amount. The funds, specifically, are to reimburse individuals for their trouble to participate in the groups. This “reimbursement” covers travel time and cost (the facilities for this project are recruiting from up to a 45-mile radius) and childcare, since all groups are conducted after school hours. It is also important to note that for each of these audiences, the incidence of reaching them is considerably lower than that of average consumer. Finally, teachers and parents will be given more than $75 for their participation given that their discussion sessions are two hours in length, not 90 minutes.

|  |  |  |
| --- | --- | --- |
| Location | Audience | Reimbursement amount per participant |
| Baltimore, MD | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $100 |
| Middle School Teachers | $100 |
| Cleveland, OH | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $100 |
| Middle School Teachers | $100 |
| Riverside, CA | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $75 |
| Middle School Teachers | $100 |
| Atlanta, GA | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $100 |
| Middle School Teachers | $100 |
| Des Moines, IA | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $75 |
| Middle School Teachers | $90 |
| Dallas, TX | Middle School Students | 0 |
|  Parents of Student Participants | $50 |
| Middle School Parents | $75 |
| Middle School Teachers | $75 |
| Telephone Focus Groups | Middle School Principals | $75 |
| Middle School Food Service Managers | $75 |

Adults who participate in the sessions will sign an Agreement on Security of Comments (see Attachment P) ensuring that the participants’ names will not be divulged in any focus group reports. Parents of middle school students (grades 6-8) participating in the focus groups, will sign an Agreement on Security of Comments and a parental consent form (see Attachments Q and R). These forms were previously approved by OMB under FNS Core Nutrition Messages Concept Testing ICR Reference No: 200709-0584-003 (OMB control number: 0584-0524).

System of Record FNS-8, FNS Studies and Reports, published in the Federal Register on 4/25/1991 at 56 FR 19078, covers personal information collected under this study and identifies safeguards for the information collected.

Focus Group Sessions

Each mini focus group with middle school students (grades 6-8) will last 60 minutes. Mini focus groups with parents of middle school students and focus groups with middle school teachers will last 120 minutes. Telephone focus groups with middle school principals and food service managers will last 90 minutes. In all sessions, a trained moderator will facilitate discussion as described in the Moderator’s Guides (Attachments F-J).

###### Data Analysis

Focus groups will be audio-recorded using professional equipment and the information collected will be used to inform the final messages and related products. We will summarize the key findings in a report for future reference.  Respondents will be informed that the sessions are recorded. Recordings will be transcribed, with no names being associated to individual respondents' comments. Notes taken while watching all focus group sessions and transcripts of audio recordings will serve as the primary methods of data collection.  Focus group transcripts will be reviewed for recurring themes stated across multiple focus groups and respondents.

Differences across group location and audience will be noted when appropriate, but given the qualitative nature of this research, findings will be considered descriptive and directional but not definitive.  No names will be associated with individual respondents’ comments in the final report.
No attempt will be made to generalize the findings to be nationally representative or statistically valid.

Outcome

Information and formative input gathered from the specific target audiences through both the formative and evaluative rounds of research will help to understand the key themes and messages that are most effective at motivating the target audience to take action. FNS may decide to publish summary findings of the focus group research either electronically or in print, but such documents will not include information that personally identifies focus group participants.

1. **Confidentiality**: Participants will be informed of confidentiality and privacy act provisions before the interview (see Attachments P and Q). System of Record FNS-8, FNS Studies and Reports, published in the Federal Register on 4/25/1991 at 56 FR 19078, covers personal information collected under this study and identifies safeguards for the information collected.
2. **Federal Costs**: Contract costs, formative research tasks (for middle school students, parents of middle school students, middle school teachers, middle school principals and middle school food service managers): $273,701.28
3. **Research Tools/Instruments**:

Formative Round:

* Attachment A: Mini Group Screening Questionnaire for Middle School Students (To be used in Evaluative Round as well)
* Attachment B: Mini Group Screening Questionnaire for Parents of Middle School Students (To be used in Evaluative Round as well)
* Attachment C: Focus Group Screening Questionnaire for Middle School Teachers (To be used in Evaluative Round as well)
* Attachment D: Telephone Focus Group Screening Questionnaire for Middle School Principals (To be used in Evaluative Round as well)
* Attachment E: Telephone Focus Group Screening Questionnaire for Middle School Food Service Managers (To be used in Evaluative Round as well)
* Attachment F: Mini Group Moderator’s Guide for Middle School Students
* Attachment G: Mini Group Moderator’s Guide for Parents of Middle School Students
* Attachment H: Focus Group Moderator’s Guide for Middle School Teachers
* Attachment I: Telephone Focus Group Moderator’s Guide for Middle School Principals
* Attachment J: Telephone Focus Group Moderator’s Guide for Middle School Food Service Managers

Agreement on Security of Comments and Consent Forms Used in Both Rounds:

* Attachment P: Agreement on Security of Comments for Adults
* Attachment Q: Agreement on Security of Comments for Parents of Middle School Students (grades 6-8)
* Attachment R: Parental Consent Form