

Memorandum

Date: August 23, 2013

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

Through: Rachelle Ragland Greene, 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. 0584-0523 Request for Approval to Perform Formative Research for MyPlate Kindergarten Lessons

The Food and Nutrition Service (FNS) and Center for Nutrition Policy and Promotion (CNPP) of the USDA Food, Nutrition, and Consumer Services are requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0523.

This request is to acquire clearance to conduct formative research to obtain feedback on the practicality, clarity, and usability of draft MyPlate kindergarten lessons in school classrooms. The findings will inform revisions prior to the release of the final curriculum. Previous formative research explored concepts for curriculum materials such as an emergent reader, lesson “food group characters,” food preparation activities, and a song (MyPlate Kindergarten Curriculum Materials, ICR 201201-0584-026, OMB Clearance Number 0584-0523, February 26, 2013).

The following information is provided for your review:

1. **Title of the Project:** MyPlate Kindergarten Lessons
2. **Control Number:** 0584-0523
3. **Public Affected by this Project:** Individuals/Households, and State, Local/Tribal Employees
 - Kindergarten students in classrooms of schools that participate in the National School Lunch Program (NSLP).
 - At least 40% of which will reside in households whose income falls at or below 185% of the Federal poverty line as approximated by eligibility for reduced or free lunch under the NSLP.
 - Parent/caregivers (both English - and Spanish-speakers) of kindergarten students in schools that participate in the NSLP.
 - Participating parent/caregivers will be the guardians/caregivers of the children participating in the kindergarten classrooms specified above.

- o At least 40% of which will reside in households whose income falls at or below 185% of the Federal poverty line as approximated by eligibility for reduced or free lunch NSLP.
- Kindergarten teachers who are employed by the schools that participate in the NSLP.
- School nutrition directors who are employed by the schools that participate in the NSLP.
- Principals of schools will assist with participant recruitment, but will not participate in any research activities.

See section 7, *Project Purpose, Methodology & Formative Research Design* for a description of the number of participants for each audience by research methodology (focus groups, individual interviews, and surveys).

4. Number of Respondents:

The total estimated number of participants is 268: 8 principals, 4 school nutrition directors, 16 kindergarten teachers, 120 parents/caregivers of the students, and 120 kindergarten students. Responder estimates are based on response rates of 50% for principals, 25% for teachers, 25% for parents/caregivers, 70% for students, and 50% for school nutrition directors. The response rates generally are based on previous research in similar populations (ICR reference number 201008-0584-001). The estimated teacher response rate, however, is lower than in previous research, to compensate for the high quantity of teachers that will need to provide consent at each site.

Number of respondents

Target audience	Total number of participants	Proportion of Responders	Proportion of Non-Responders
Principals	8	50% (4)	50% (4)
School Nutrition Director	4	50% (2)	50% (2)
Kindergarten Teachers	16	25% (4)	75% (12)
Parents/Caregivers	120	25% (30)	75% (90)
Students (Kindergarten)	120	70% (84)	30% (36)
Total	268	124	144

Principals of schools selected as sites for the pilot research will recruit and obtain consent (see Attachments A) from two kindergarten teachers at their school (total of four teachers). Both student and parent/caregiver participants will be recruited from the classrooms of these teachers. The principal will provide teachers with instructions for

distributing a letter and forms to be sent home with each of their students (see Attachment B). Each of these classroom teachers will be responsible for:

- Distributing a letter of invitation and a parental consent form to each of his/her students to take home (see Attachment B).
 - Invitation letters and parental consent forms will solicit parent/caregiver's permission for their children to participate in the formative research.
 - Invitation letters, screeners and consent forms to parent/caregivers will solicit parent/caregiver's participation in focus groups.
- Collecting all forms.
 - Teachers will collect and return screeners and parental consent forms to the evaluation contractor.

The four kindergarten teachers will each conduct the six-lesson curriculum as part of their normal classroom instruction. Teachers will also complete educator journals (see Attachment E) and participate in individual interviews (see Attachment D).

School nutrition directors will be identified by principals before schools are selected for participation, in order to guarantee adequate involvement by the school nutrition director in curriculum activities. The school nutrition director will provide consent for their own participation in supporting the in-class food preparation and cafeteria activities (see Attachment C). In addition, the school nutrition director at each site will participate in an individual interview (see Attachment J).

Recruitment of parents/caregivers for focus groups will be conducted among parents/caregivers of children in the four classrooms participating in research. Each classroom is estimated to have 30 students (120 total) so that approximately 120 parents/caregivers will receive a packet with an invitation letter, screener, pre-test survey (see Attachment G), parental consent form, and consent for child participation form (see Attachment B). Of those packets distributed, it is anticipated that 25% (total=30) of parents/caregivers will complete and return forms to the classroom teachers, indicating interest and availability to participate in parent/caregiver focus groups. Once completed forms are returned, the evaluation contractor will review them to determine which parents/caregivers meet minimum qualifying criteria. The questions on the parental screener will be used to guarantee the groups represent racial/ethnic and socio-economic diversity and to identify parents who primarily speak Spanish for the Spanish-language focus groups.

It is anticipated that 70% of parent/caregivers will complete and return forms to classrooms teachers giving permission for their child's participation (total=84).

Educator Journals and Individual Interviews with Kindergarten Teachers

Teachers recruited by the principal and consented to participate at each of the two sites (total teachers=4) will lead the six-lesson curriculum in their classrooms. They will be

expected to keep an educator journal (see Attachment E) where they will record notes and observations about the lessons and complete brief questions about their experiences. After completion of the lessons they will participate in an in-depth phone interview (see Attachment D).

Individual Interviews with School Nutrition Directors

The school nutrition directors at both sites will participate in a one-on-one phone interview (see Attachment J) to discuss their experience supporting classroom and cafeteria activities.

Parents/Caregivers Focus Groups

Parents/caregivers with children in participating kindergarten classrooms will be recruited to participate in focus group interviews (see Attachment F, English and Spanish). One group will be conducted at each site with eight parent/caregivers in each group, for a total of two groups and sixteen parent/caregivers. In order to recruit eight parents per group, ten will be invited to each group. At one of the research sites, Spanish-speaking parents will be identified through the screening process and with teacher input in order to recruit participants for the group to be conducted in Spanish (see Attachment F – Spanish Version).

Parent Focus Group Participants

Target Participants	# of Groups	# of Participants per group	Total # of participants
Parents from Northeast or Mid-Atlantic Region Site – (In Spanish)	1	8	8
Parents from Southwest, Mountain-Plains, or Western Region Site – (English)	1	8	8
Total	2	-	16

Student Interviews

Kindergarten students in participating classrooms will complete pre- and post-test surveys (see Attachment H) administered in one-on-one interviews, in order to assess changes in student’s knowledge about the MyPlate food groups and the benefits of healthy eating habits. Students will participate in the interviews only if they and their parent/caregiver consent. All children will participate in the lessons, as they will take place as part of typical classroom instruction.

Student Interviews

Target Participants	# of classrooms	# of students per classroom	Total # of participants
Students from Northeast, Mid-Atlantic, or Southeast Region Site	2	21	42
Students from Southwest, Mountain-Plain, or Western Region Site	2	21	42
Total	4	-	84

5. Time Needed Per Response:

In the tables below, the time noted is an average response time for each member of the target audience, by activity. Principals will identify and invite eligible teachers/classrooms, give direction to teachers to assist in distributing and collecting parent/caregivers forms, and ship completed forms to the evaluation contractor. Teachers will complete teacher consent forms, distribute invitation letters, screeners, and consent forms to students in his/her class, collect completed forms, and return completed forms to the principal. Teachers will also complete the lessons, record their notes in educator journals, and participate in individual interviews. Parent involvement includes completing invitation letters, screeners, and consents forms, as well as participating in focus groups. Student involvement includes receiving parent invitation letter and forms from the teacher, taking those documents home to a parent/caregiver, and returning forms (if completed) to the teacher. Students will also participate in the lessons as part of their normal classroom instruction.

Time Needed per Initial School Staff Recruitment and Consent

Target Audience	Time (minutes)	Time (hours)
Principals (responders, n=4)	30	0.5
Principals (non-responders, n=4)	2	0.03
Teachers (responders, n=4)	10	0.17
Teachers (non-responders, n=12)	2	0.03
School Nutrition Directors (n=2) (responders, n=2)	10	0.17
School Nutrition Directors (non-responders, n=2)	2	.03

Time Needed per Initial Parent/Caregiver Screener & Consent Form for Parent/Caregiver and Child Consent

Target Audience	Time (minutes)	Time (hours)
Principals (N=2; distribute to teachers)	10	0.17
Teachers (N=4; distribution and collection of form)	30	0.50
Students (n=84 responders; taking consent form home)	10	0.17
Students (n=36 non-responders)	2	0.03
Parent/Caregiver of Kindergarten students (n=84 responders)	20	0.33
Parent/Caregiver of Kindergarten students (n=36 non-responders)	2	0.03

Target Participants	Research Activity	Time (minutes)	Time (hours)
Teachers (N=8)	Curriculum Activities	720	12
	Educator Journal	60	1
	Individual Interview	30	.50
Students (N=84)	Pre- and Post-Test Interview	30	.5
Students (N=84)	Curriculum Activities	720	6
School Nutrition Director (N=2)	Curriculum Activities	180	3
	Individual Interview	30	.5
Parent/Caregiver (N=20)	Confirmation Letter & Call	8	.13
Parent/Caregiver (N=16)	Focus Group Interview	90	1.5

6. Total Burden Hours on Public:

(a)	(b)	(c)	(d)	(e)	(f)	(g)	
Affected Public	Respondent Type	Screeners, Surveys	No. Respondents	Frequency of Response	Est. Total Annual Responses per Respondent (c x d)	Hours per Response	Total Burden Hours (e x f)
State, Local/ Tribal Employees	Elementary School Principals (responders n=4)	Recruitment and Distribution of Teacher Letter and Consent Forms	4	1	4	0.50	2.00
		Distribution of Parent Letter, Forms to Classroom Teachers, Return Completed Forms to Evaluator	2	1	2	0.17	0.34
	Elementary School Principals (non-responders n=4)	Recruitment and Distribution of Teacher Letter and Consent Forms	4	1	4	0.03	0.12
	Elementary School Classroom Teachers (responders n=4)	Response & Consent Forms	4	1	4	0.17	0.68
		Distribution of Parent Letter, Forms to Students, Collect Complete Forms, Return to Principal	4	1	4	0.50	2.00
		Curriculum Activities	4	1	4	12.00	48.00
		Individual Interview	4	1	4	0.50	2.00
		Educator Journal	4	1	4	1.00	4.00
	Elementary School Classroom Teachers (non-responders n=12)	Response & Consent Forms	12	1	12	0.03	0.36
	School Nutrition Directors (responders n=2)	Response & Consent Forms	2	1	2	0.17	0.34
		Supporting Classroom Activities	2	1	2	3.00	6.00
		Individual Interview	2	1	2	0.50	1.00
	School Nutrition Directors (non-responders n=2)	Response & Consent Forms	2	1	2	0.03	0.06
Subtotal			28		50		66.9
Individuals & Households	Parent/Care-givers (responders n=84)	Response & Consent Forms	84	1	84	0.33	27.72
		Focus Group Interview	16	1	16	1.50	24
		Confirmation Letter and Call	20	1	20	0.13	2.6
	Parents/Caregivers (non-responders n=36)	Response & Consent Forms	36	1	36	0.03	1.08
	Elementary School Students (all students=120)	Curriculum Activities	120	1	120	12.00	1440
	Elementary School Students (responders n=84)	Response & Consent Forms	84	1	84	0.17	14.28
		Pre- and Post-Test Interviews	84	1	84	0.50	42
Elementary School Students (non-responders n=36)	Response & Consent Forms	36	1	36	0.03	1.08	
Subtotal			240		480		1552.76
Total			268	-	530	-	1612.26

Total burden hours on public: 1612.26

7. Project Purpose, Methodology, and Formative Research Design:

Background

The USDA Food and Nutrition Service (FNS) administers the nutrition assistance programs for the United States Department of Agriculture (USDA). The mission of FNS is to provide children and low resource 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.

As authorized under Section 6(a)(3) of the Richard B. Russell National School Lunch Act, 42 USC 1755(a)(3), FNS provides training and technical assistance for school foodservice, nutrition education for children and their caregivers, and encourages school and community support for healthy eating and physical activity. These activities are implemented under the Agency's Team Nutrition initiative that is designed to improve children's lifelong eating and physical activity habits by using the principles of the *Dietary Guidelines for Americans*.

Under this initiative, FNS is currently developing nutrition education lessons and materials that promote healthy meal selection and consumption, while meeting education standards for academic course content in kindergarten. This nutrition education will build skills and motivation for children to make healthier food and physical activity choices as part of a healthy lifestyle.

The above-mentioned lessons and related resources will support Team Nutrition's behavior-oriented strategy of "providing multifaceted, integrated nutrition education for children and their parent/caregivers."

Purpose

The purpose of the proposed research is to (1) gather feedback from teachers and school nutrition director about the curriculum activities, (2) assess changes in students' and parents' recognition of MyPlate and the five food groups, and (3) to inform the development of nutrition information for parents/caregivers.

The formative research with parents/caregivers will verify that materials and messages are clear, credible, relevant, and useful to the intended audience, and ultimately compel audiences to take action. The interviews with teachers and food service staff, as well as the educator journals are designed to identify nutrition education activities and materials that are engaging and easily implemented in today's classrooms.

Methodology/Research Design

In order to address the objectives of this research, five methodologies will be utilized: qualitative interviews with teachers and school nutrition directors; qualitative educator journals; quantitative surveys conducted by interviews with children; qualitative focus groups with parents/caregivers; and qualitative surveys completed by parent/caregivers.

Individual Interviews with Teachers. Four kindergarten teachers at each of the two school sites will conduct the curriculum activities with their students. After activities are complete, each teacher will participate in an individual interview by telephone or in person. Interview duration will be 30 minutes, and the focus will be:

- To identify and understand contextual factors that may engender and/or inhibit teachers' willingness to implement the curriculum activities.
- To identify areas where teachers need additional information or training in order to implement the curriculum. To assess the ease-of-use, relevance, clarity, and perceived quality of the curriculum
- To determine teacher perceptions of student interest in and learning from the activities.

Educator Journals with Teachers. Participating teachers will complete educator journals (see Attachment E) during the course of the curriculum implementation period. Journals will include personal reflections about the curriculum activities, perception of student enjoyment for the curriculum activities, and standardized process measures. Teachers will complete one entry per lesson (total of 6 entries).

Individual Interviews with School Nutrition Director. The School Nutrition Director will participate in an individual interview after the curriculum activities have been completed. Interview duration is anticipated to be 30 minutes, and the focus will be:

- To assess the ease-of-use, relevance, feasibility, and perceived quality of the curriculum activities.
- To determine the school nutrition director's perceptions of student interest in and learning from the activities.
- To identify strategies for creating meaningful connections and collaborations between school nutrition services and classroom instruction.

Interviews with Students. Participating kindergarten students will complete interviews both prior to the curriculum's implementation and at the conclusion of its curriculum implementation period (see Attachments H and I: Individual Interview Guide and Storybook). The combined duration of these interviews is anticipated to be 30 minutes, and the focus will be to:

- Assess changes in children’s knowledge of the MyPlate food groups, the importance of eating from all five groups, breakfast, and physical activity, and how vegetables and fruits grow from a seed.
- Assess changes in children’s ability to create healthy meals using the MyPlate food groups.

Focus Groups with Parents/Caregivers. Focus group interviews will be conducted with parents/caregivers of participating kindergarten students in the two selected schools. One parent focus groups will be conducted in each school, for a total of two focus groups. Groups will be segmented by location and language as follows:

Northeast, Mid-Atlantic, or Southeast Region Locale	Students from Southwest, Mountain-Plain, or Western Region Site
1 groups of Spanish-Speaking Parent/Caregivers	1 groups of English-Speaking Parent/Caregivers

In order to seat at least eight parents in each group (total=16), ten parent/caregivers will be invited to participate. Each group will last approximately 90 minutes. The main focus of the parent/caregivers focus groups will be:

- To identify and understand contextual factors that may engender and/or inhibit parent/caregivers acceptance of and motivation to act upon nutrition messages about healthy food choices from the five food groups, breakfast, school meals, and being physically active.
- To assess the appeal, comprehension, and relevance of nutrition education materials for parents/caregivers of kindergarten age children.
- To identify the degree to which parents/caregivers used take-home materials with their children (see Attachment L) and/or participated in in-school food preparation activities.

Parents/Caregivers attending the focus group will also be given a brief survey (see Attachment G) when they arrive. The survey is included in the estimated 90-minute duration of the focus groups. The primary focus of the survey is to assess changes in:

- Parent/caregivers perceptions about the importance of physical activity.
- Parents/caregivers knowledge of MyPlate food groups.
- The frequency with which children eat breakfast.

The same questions from the survey will be embedded in the consent materials (see Attachment B) in order to measure change in parent’s perceptions and knowledge.

Design/Sampling Procedures

The sample will include four different audiences, as described above: kindergarten students; their parents/caregivers; their teachers; and the school nutrition director of the selected school sites. Schools will be recruited utilizing purposive and convenience sampling procedures. Both selected schools will participate in the NSLP and School Breakfast Program. Participating schools will be racially and ethnically diverse and represent families of a broad range of household income levels, including segments of the target audience that are low income, based on eligibility for free or reduced lunch under the NLSP.

Qualifying parent/caregivers will be those who have participating students in classrooms in selected schools. Only one parent/caregiver per child will be allowed to participate in the focus group.

Site Selection

Two schools with interested school nutrition directors and principals willing to recruit kindergarten teachers, kindergarten students and their parents/caregivers, will be selected. Each school will represent a different FNS region of the country and have at least 40% of the school population eligible to receive free or reduced priced lunches under the NLSP. One of the schools will have a high percentage of the school population that identifies their ethnicity as Hispanic, in order to facilitate recruitment of Spanish-speaking parents/caregivers for the focus groups.

Recruitment

With approval from the site principal, kindergarten teachers agreeing to participate will distribute consent packets to each of their students to take home to their parents/caregivers. This recruiting strategy will be used as schools cannot/do not release students' contact information because of privacy concerns addressed in the Family Educational Rights and Privacy Act (FERPA). The consent packets will include consent forms and detailed information about the research. Parents/caregivers who are interested in participating and/or willing to allow their children to participate in the student interviews will complete, sign, and return the parents/caregivers consent form to the teachers.

Confirmation of Participation

A follow-up letter of confirmation (see Attachment K) will be mailed to parent/caregivers who have agreed to participate in focus groups. The letter will thank the participant for agreeing to be part of the focus group, remind them of the date, time and location of the groups, and provide other information about scheduling, directions, etc., as needed. Follow-up "reminder" phone calls (see AttachmentK) will be made to parents/caregivers a day or two prior to the scheduled dates.

Incentives

Parent/caregiver focus group participants will be given \$50 as a token of appreciation. Teachers conducting curriculum activities, completing educator journals, and participating in individual interviews will be given \$200 as a token of appreciation. School nutrition directors participating in individual interviews and curriculum activities will be given \$50 as a token of our appreciation. The selection of these amounts comes from past experience of the evaluators in the recruitment of families and school staff for participation in after-school focus groups and interviews. Each school site will receive an honorarium in the form of a gift to the school not exceeding \$350 for their efforts in supporting the research activities.

Interview and Focus Group Sessions

Time. Teacher interviews will each last 30 minutes. Parent/caregiver and teacher focus groups will each last 90 minutes. Student interviews will each last 15 minutes. School nutrition director interviews will last 30 minutes.

Interview Content. A trained moderator will facilitate interviews/discussions as described in the *Moderator's Guide for Parent Focus Groups* (see Attachment F), *Teacher Interview Guideline* (see Attachment D), *School Nutrition Director Interview Guideline* (see Attachment J), and *Students Interview Guideline* (see Attachment H) as appropriate to the audience.

Consent. School nutrition director consent forms will be collected during the site selection process. Teacher consent forms will be collected at the outset of the study, prior to the parent/student recruitment process. Consent forms (for parent/caregivers and their children) will be obtained during the recruitment process. These forms are modeled after those previously approved by OMB under “Formative Research About FNS Curriculum Messages for 5th and 6th Grades” (control number: 0584-0523, ICR 201207-0584-007), with the only modifications reflecting the content of the focus groups and interviews, as well as the audience and duration of the curriculum. Parent/caregiver consent materials will be made available in Spanish for Spanish-speaking parents.

Data Analysis

Qualitative Data. All teacher and school nutrition director interviews as well as parent focus groups will be audio-recorded (with respondent permission) and transcribed. This text, as well as the written feedback provided on the educator journal, will become the data for qualitative analysis. Codes, representing new insights and relevant participant experiences and opinions, will be identified using Grounded Theory, by which codes and themes are allowed to emerge from the text (Corbin & Strauss, 1990; Glaser, 1992; Henwood & Pidgeon, 2003; Walker & Myrick, 2006). In order to ensure that individuals did not bias findings, multiple researchers will code interview transcriptions, and themes will be compared and synthesized in Qualitative Debriefing Sessions. Findings will be considered descriptive and directional, but not definitive. No attempt will be made to generalize findings as nationally representative or statistically valid.

Quantitative Data. All student interviews will be entered into the PASW Statistics Program of quantitative analysis. Paired-samples t-tests will be conducted to evaluate any gains in participants' knowledge. In addition, between-group analysis will be conducted for each classroom using Analysis of Variance (ANOVA) to determine if there are differences in children's knowledge based on increased exposure to curriculum (Tabachnick & Fidell, 2007). Though the results of this analysis will be quantitative in nature, no attempt will be made to generalize findings to the larger population given the sample size and sampling procedure.

Outcomes/Findings

Information and formative input gathered from specific target audiences through the research will help develop a final products that are final products are relevant, meaningful and easy-to-use. FNS may decide to publish summary research findings either electronically or in print, but such documents will not include information that personally identifies any of the research participants.

8. Confidentiality:

Using the *Agreement on Security of Comments Form* participants will be informed of privacy act provisions before responding to the screener. 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.

9. Federal Costs: \$107,316.15

10. Research Tools/Instruments:

- **Attachment A:** Teacher Letter, Screener, and Informed Consent Form (Teacher Consent Package for Primary Teachers)
- **Attachment B:** Parent/Caregiver Letter, Survey for Participation in Focus Groups, Informed Consent Form for Parent/Caregiver and Informed Consent Form for Student (English and Spanish Versions)
- **Attachment C:** School Nutrition Director Letter, Survey for Participation in Focus Groups and Informed Consent Form (Food Service Staff Consent Package)
- **Attachment D:** Individual Interview Guide for Teachers
- **Attachment E:** Educator Journal
- **Attachment F:** Moderators Guide for Parent/Caregiver Focus Groups (English and Spanish Versions)
- **Attachment G:** Parent/Caregiver Survey (English and Spanish Versions)
- **Attachment H:** Individual Interview Guide for Children
- **Attachment I:** Individual Interview Storybook for Children
- **Attachment J:** Individual Interview Guide for School Nutrition Directors
- **Attachment K:** Parent/Caregiver Follow-Up Letter and Reminder Phone Call Sample Script
- **Attachment L:** Parent Take Home Stimulus