**Memorandum**

**Date: November 14, 2011**

**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 *Team Nutrition Curriculum Messages for 5th and 6th Grades***

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 for inclusion in a garden-related nutrition education curriculum for fifth- and sixth-grades. FNS conducted similar formative research with third- and fourth-grades under “Formative Research about FNS Team Nutrition Curriculum Messages”, which was approved in March 2011.

The following information is provided for your review:

1. **Title of the Project:** Formative Research for fifth- and sixth-grade Garden Based Nutrition Curriculum Message and Communication Tool Development
2. **Control Number:** 0584-0524
3. **Public Affected by this Project:** Individuals/Households, and State/Local Employees
* Fifth- and sixth-grade students in classrooms of schools that participate in the National School Lunch Program (NSLP).
* One-third of students will reside in a household whose income falls at or below 185% of the Federal poverty line.
* Parent/caregivers of fifth- and sixth-grade students in schools that participate in the NSLP.
* Participating parent/caregivers will be the guardians/caregivers of the children participating in the student groups above.
* One-third of parent/caregivers will reside in a household whose income falls at or below 185% of the Federal poverty line.
* Fifth- and sixth-grade teachers who are employed by schools participating in the NSLP.

See section 7, *Project Purpose, Methodology & Formative Research Design* for a description of the number of focus groups for each audience, student and parents/caregivers. The formative research focus groups will be conducted only with English-speaking audiences. Materials are designed to support school course content in the English Language Arts as well as Math, Science and Health. FNS plans to investigate opportunities to translate materials for Spanish-speaking parents/caregivers once development is completed.

1. **Number of Respondents:**

One hundred and eight respondents will participate in focus groups: 60 fifth- and sixth-grade students; 30 parents/caregivers of participating fifth- and sixth-grade students; and 18 teachers of participating fifth- and sixth-grade students. Only parents/caregivers will participate in the screening process. In order to recruit 108 respondents, 1101 potential participants will be screened: 540 fifth- and sixth-grade students; 540 parents/caregivers; 18 teachers, and 3 principals.

The selected schools' principals (one administrator at each of three school sites) will recruit and obtain consent from three fifth- and three sixth-grade teachers from whose classrooms parents/caregivers and student respondents will be selected through the screening process to participate in focus groups; focus groups will be held at each of three school sites. The principal will provide teachers with instructions for distributing a letter and forms to be sent home with each of their students. Each classroom teacher will be responsible for:

* Distributing a letter of invitation, a response form (screener), and a parental consent form to each of his/her fifth- or sixth-grade students to take home.
	+ Invitation letters, screeners and consent forms to parents/caregivers will solicit parents/caregivers participation in focus groups.
	+ Invitation letters, screeners and parental consent forms will solicit parent/caregivers permission for their children to participate in focus groups.
* Collecting all forms.
	+ Teachers will collect and return screeners and parental consent forms to the evaluation contractor.

Recruitment will be conducted in six classrooms (three 5th grade, three 6th grade) in each of the three schools. Each classroom is estimated to have 30 students (540 total) so that 540 parents/caregivers will receive a packet with an invitation letter, screener, and parental consent form. Of those packets distributed, it is anticipated that 20% (total=108) will complete and return forms to the classroom teachers, indicating interest in and availability to participate in formative testing. Once completed forms are returned, the evaluation contractor will review them to determine which parents/caregivers and their children meet minimum qualifying criteria, and are interested in and available to participate at the specified date and time. The questions on the parental screener will be used to guarantee the groups represent racial/ethnic and socio-economic diversity. Parents/caregivers and their children are not both required to participate in focus groups.

Student Focus Groups

Fifth- and sixth-grade students of qualifying parents/caregivers will be assigned to participate in one of two student focus groups at each of the three sites (60 respondents total). The two focus groups conducted at each site will be segmented by gender; i.e., fifth- and sixth-grade boys will be assigned to one group and fifth- and sixth-grade girls to another. Students will participate only if they consent to do so. Each focus group will consist of eight to ten respondents, for a total of 48 to 60 respondents. An outline of group segmentation is provided in the table below.

Parent/caregivers Focus Groups

Qualifying parents/caregivers will be contacted by the evaluation contractor and invited to attend a parent focus group. In order to seat eight parents/caregivers at each site's focus group (total=24 parents/caregivers), 10 parents/caregivers will be invited to each parent focus group.

Teacher Focus Groups

Teachers selected by the principal and consented to participate at each site will be invited to attend one teacher focus group at each participating school. In order to seat at least four teachers at each site’s focus group (total=12 teachers), six teachers will be invited to attend each group.

|  |
| --- |
| *Focus Group Participants* |
| **Target Participants** | **# of Groups** | **# of Participants per group** | **Total # of participants** |
| 5th and 6th Grade Students | 6 | 8-10 | 48-60 |
| Parents/caregivers of 5th and 6th Grade Students | 3 | 8-10 | 24-30 |
| 5th and 6th Grade Teachers | 3 | 4-6 | 12-18 |
| *Total* | *12* | *-* | *84-108* |

1. **Time needed per response:**

In the tables below, the time noted is an average response time for each member of the target audience. Principal involvement includes identifying and inviting eligible teachers/classrooms, giving direction to teachers to assist in distributing and collecting parents/caregivers forms, and shipping completed forms to the evaluation contractor. Teacher involvement includes completing teacher consent forms, distributing invitation letters, screeners, and consent forms to students in his/her 5th or 6th grade class, collecting completed forms, and returning completed forms to the principal. Parent involvement includes completing invitation letters, screeners, and consents forms. Student involvement includes receiving parent invitation letter and forms from the teacher, taking those documents home to parents/caregivers, and returning forms (if completed) to the teacher.

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| --- |
| *Time Needed per Initial Teacher Recruitment & Consent* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Principals (N=3) | 30 | .5 |
| Teachers (N=18) | 10 | .17 |

|  |
| --- |
| *Time Needed per Initial Parents/Caregivers Screener & Consent Form* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Principals (N=3) | 10 | 0.17 |
| Teachers (N=18) | 15 | 0.25 |
| Students (N=108, responders) | 8 | 0.13 |
| Students (N=432, non-responders) | 2 | 0.03 |
| Parents/Caregivers (N=108, responders) | 10 | 0.17 |
| Parents/Caregivers (N=432, non-responders) | 2 | 0.03 |

|  |
| --- |
| *Time Needed per Telephone Invitation, Date/Time Confirmation* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Parents/Caregivers | 15 | 0.25 |
| Students | N/A | N/A |

Because of the young age of student respondents (10 to 12 years of age), no time is required of the students for invitation calls. They will participate in groups at school. Verbal assent will be obtained at the beginning of each group.

Teachers will not participate in screening, as they will have previously given consent (through their principals) to participate.

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| *Time Needed per Focus Group* |
| **Target Participants** | **Time (minutes)** | **Time (hours)** |
| Students (N=48-60) | 60 | 1 |
| Parents/Caregivers (N=24-30) | 90 | 1.5 |
| Teachers (N=12-18) | 90 | 1.5 |

1. **Total burden hours on public:**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| (a) | Respondent Type | (b) | (c) | (d) Frequency of Response | (e) | (f) | (g) |
| Affected Public | Survey Instruments | No. Respondents | Est. Total Annual Responses per Respondent | Hours per Response | Total Burden Hours |
|   |   |   | (c **x** d) |   | (e **x** f) |
| **Reporting Burden** | **Formative Round** | **(October 2011)** |  |  |  |  |  |
| **State, Local and Tribal Agencies** | Principals | Recruitment and Distribution of Teacher Letter and Consent Forms | 3 | 1 | 3 | 0.5 | 1.5 |
| Distribution of Parent Letter, Forms to Classroom Teachers, Return Completed Forms to Evaluator | 3 | 1 | 3 | 0.17 | 0.51 |
| Classroom Teachers | Response & Consent Forms | 18 | 1 | 18 | 0.13 | 2.34 |
| Distribution of Parent Letter, Forms to Students, Collect Complete Forms, Return to Principal | 18 | 1 | 18 | 0.25 | 4.5 |
| Focus Group Interview | 18 | 1 | 18 | 1.5 | 27 |
| **Subtotal** |  |  | **21** | **-** | **21** | **-** | **35.85** |
| **Individuals & Households** | Parents/ Caregivers (responders) | Response & Consent Forms | 108 | 1 | 108 | 0.17 | 18.36 |
| Invitation Call | 30 | 1 | 30 | 0.12 | 3.6 |
| Focus Group Interview & Brief Survey | 30 | 1 | 30 | 1.5 | 45 |
| Parents/Caregivers (non-responders) | Response & Consent Forms | 432 | 1 | 432 | 0.03 | 12.96 |
| Students(responders) | Consent Forms | 108 | 1 | 108 | 0.13 | 14.04 |
| Focus Group Interview & Brief Survey | 60 | 1 | 60 | 1 | 60 |
| Students(non-responders) | Consent Forms | 432 | 1 | 432 | 0.03 | 12.96 |
| **Subtotal** |  |  | **1080** | **-** | **1080** |  | **166.92** |
| **Grand Total** |  |  | **1101** | **-** | **1101** | **-** | **202.77** |

**Project purpose, methodology, and formative research 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 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. 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 develops curriculum and related resources that support Team Nutrition’s behavior-oriented strategy of “providing multifaceted, integrated nutrition education for children and their parents/caregivers.” Such curricula are designed to build skills and motivation for children to make healthier food and physical activity choices as part of a healthy lifestyle.

FNS is currently developing garden-related nutrition education lessons that promote fruit and vegetable consumption while meeting education standards for academic course content in third- and fourth-grades. These lesson plans will fill a need for a national nutrition education curriculum that connects and reinforces farm-to-school, school garden, and school meal initiatives.

The lessons will specifically address key factors research has shown to be predictive of children’s fruit and vegetable intake: preference and taste, availability and accessibility of fruits and vegetables in the school and home environment, and food preparation skills. The lessons will support efforts designed to increase fruit and vegetable intake among children – particularly intake of dark green and orange vegetables and increase awareness of how fruits and vegetables are grown.

Purpose

The purpose of the proposed formative research is to obtain feedback from students in the fifth- and sixth-grades and their parents/caregivers on key messages that will be communicated through garden-related nutrition education lessons and featured in take-home parent/caregivers materials. The messages will focus on motivating children to consume fruits and vegetables featured in the lessons and encourage parents/caregivers to model healthy behaviors related to nutrition, specifically gardening and produce preparation and consumption.

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

The focus groups with teachers are designed to identify nutrition education activities that are engaging and easily implemented in today’s classrooms.

Methodology/Research Design

Focus group interviews will be conducted with 5th – 6th grade students, parents/caregivers of 5th – 6th grade students, and 5th – 6th grade teachers to inform the development of the curriculum and nutrition education messages that motivate and encourage children to consume fruits and vegetables. Focus group interviews will be conducted in schools in three different areas of the country to be chosen in collaboration with the National Gardening Association. During the final 5 minutes of each focus group, student and parents/caregiver participants will be given a brief written survey to obtain data that is more efficiently obtained through individual questionnaires (e.g. vegetable preferences, parental attitudes around health etc.).

*Focus Groups with Students*. Focus group interviews will be conducted with 5th – 6th grade students in three geographically diverse locations. Two student focus groups will be conducted in each location, for six focus groups in total. Student groups will be segmented by grade and gender as follows:

|  |  |  |
| --- | --- | --- |
| **Locale 1** | **Locale 2** | **Locale 3** |
| 1 group of 5th–6th grade girls | 1 group of 5th–6th grade girls | 1 group of 5th–6th grade girls |
| 1 group of 5th–6th grade boys | 1 group of 5th–6th grade boys | 1 group of 5th–6th grade boys |

Each group will consist of between four to five students (total=48-60), and will last approximately 60 minutes. The main focus of the student focus groups will be:

* To identify and understand contextual factors that may engender and/or inhibit students' acceptance of and motivation to act on messages designed to promote consumption of fruit and vegetables, especially those featured in the curriculum.
* To assess a series of test messages designed to promote students' consumption of fruits and vegetables featured in the curriculum.

*Focus Groups with Parent/Caregivers.* Focus group interviews will be conducted with parents/caregivers of participating 5th – 6th grade students in the three selected school districts/locations. One parent group will be conducted in each school, for three focus groups in total. Groups will be segmented by location as follows:

|  |  |  |
| --- | --- | --- |
| **Locale 1** | **Locale 2** | **Locale 3** |
| 1 group of 5th–6th grade parents/caregivers | 1 group of 5th–6th grade parents/caregivers | 1 group of 5th–6th grade parents/caregivers |

Each group will consist of between eight and ten parent/caregivers (total=24-30), and will last approximately 90 minutes. The main focus of the parents/caregivers focus groups will be:

* To identify and understand the contextual factors that may engender and/or inhibit parents/caregivers' motivation to act on messages designed to increase the availability and accessibility of fruits and vegetables at home.
* To assess test messages designed to increase the availability and accessibility of fruits and vegetables at home, particularly those fruits and vegetables featured in the curriculum (i.e., being grown in the garden).
* To identify and understand parent’s comfort with and access to online communication tools designed to support in class activities.

*Focus Groups with Teachers.* Focus group interviews will be conducted with teachers of 5th – 6th grade students. One group will be conducted in each location, for three focus groups as follows:

|  |  |  |
| --- | --- | --- |
| **Locale 1** | **Locale 2** | **Locale 3** |
| 1 group of 5th–6th grade teachers | 1 group of 5th–6th grade teachers | 1 group of 5th–6th grade teachers |

Each group will consist of 4-6 teachers (total=12-18), and will last approximately 90 minutes. The main focus of the teacher focus groups will be:

* To identify and understand contextual and other factors that present opportunities and/or barriers to adoption of the nutrition curriculum into coursework.
* To identify engaging nutrition education activities that are easily integrated into classroom lessons plans.

Design/Sampling Procedures

The sample will include three different audiences, as described above: 5th – 6th grade students; their parents/caregivers; and 5th and 6th grade teachers, utilizing purposive and convenience sampling procedures. All selected schools will participate in the NSLP. Participating students/classrooms 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 (as defined at <185% of Federal Poverty Guidelines).

The formative research focus groups will be conducted only with English-speaking audiences. Materials are designed to support school course content in the English Language Arts as well as Math, Science and Health. FNS plans to investigate opportunities to translate materials for Spanish-speaking parent/caregivers once development is completed.

Qualifying parents/caregivers will be those who have participating 5th or 6th grade students at one of the three selected locations. Only one parent/caregiver per child will be allowed to participate. It is not required that both parents/caregivers and their children participate.

Site Selection

Three geographically diverse school sites/locations will be chosen in collaboration with the National Gardening Association. Each school will have access to a school garden. Sites will be chosen so that urban, suburban, and rural schools are represented.

Recruitment

With approval from the school site principal, four classrooms of 5th grade students and four classrooms of 6th grade students will participate in the recruitment process at each of the three selected sites. Teachers will distribute packets (containing the letter of invitation, parent screener, and parents/caregivers consent form) 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 letter will include a description, purpose, length of participation time, amount of reimbursement, and other details about participation in parents/caregivers focus groups. The letter will also contain details (description, purpose, length, etc.) about their children's participation in student focus groups. Interested parents/caregivers who meet initial criteria (specified in the letter) and are available to participate in focus groups will return the screener to the teachers. Parents/caregivers who are interested in and willing to allow their children to participate in student focus groups at school will also complete, sign and return the parents/caregivers consent form. After the due date for returning the forms, teachers will return all completed forms to the principal, who will ship the forms to the evaluator. Evaluators will use these forms to select parents/caregivers to call and invite to participate. Selection of eligible parents/caregivers and students will ensure a balance of student grade and gender, and diversity in terms of participant race, ethnicity, and household income level (at least third will be low-income). A select group of parents/caregivers and students will be confirmed for participation in focus groups.

Confirmation of Participation

A follow-up letter of confirmation will be mailed to parents/caregivers who have agreed to participate in focus groups, and/or who have agreed to allow their children to participate in focus groups at school. The letter will thank the participant for being a 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. Teachers will receive notification from their principals about date, time and location of teacher focus groups. Dates and times will be decided on with input from teachers and will take place after school hours.

Reimbursements

Parents/caregivers and teacher participants will be given a cash stipend of $50 each as reimbursement for expenses such as travel and child-care. Student participants will receive a token incentive worth $2 - $3 to enhance their participation and engage them in the focus group discussion. The selection of these amounts comes from past experience of the evaluators in the recruitment of families and teachers for participation in after-school focus groups. Each school site will receive an honorarium in the form of a gift to the school worth no more than $500 for their efforts in supporting the research activities.

Focus Group Sessions

*Time.* Student focus groups will last for a total of 60 minutes each. Parents/caregivers and teacher focus groups will last for a total of 90 minutes each.

*Interview Content.* A trained moderator will facilitate interviews/discussions as described in the *Moderator's Guide: Student Focus Groups*, *Moderator's Guide: Parents/Caregivers Focus Groups, or Moderators' Guide: Teacher Focus Groups* as appropriate to the audience.

*Consent.* Teacher consent forms will be collected at the outset of the study, prior to the student and parents/caregivers recruitment process. Consent forms (for parents/caregivers and their children) will be obtained in the recruitment process. These forms are modeled on the forms previously approved by OMB under FNS Core Nutrition Messages Concept, Testing ICR Reference No.: 200809-0584-003 (OMB control number: 0584-02-524), with the only modifications to reflecting the content of the focus groups.

Data Analysis

Focus groups will be audio-recorded using professional equipment, and the information collected will be used to inform development of the final nutrition messages. Respondents will be informed that the sessions are recorded. Recordings will be transcribed (with no names associated with individual respondents' comments). Notes taken while observing the focus group sessions and transcripts of audio recordings will be the primary methods of data collection. Transcripts and notes will be reviewed for recurring themes stated across multiple groups and respondents. Differences will be across groups, locations, and audiences will be noted as appropriate. Findings will be considered descriptive and directional, but not definitive. No attempt will be made to generalize findings to as nationally representative or statistically valid.

Outcome

Information and formative input gathered from the specific target audiences through the formative research will help to understand which messages 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**

Using the *Agreement on Security of Comments Form* (Attachments B and D),participants will be informed of confidentiality and 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.

1. **Federal Costs**: $77,094.
2. **Research Tools/Instruments:**
	* Attachment A – Teacher Letter, Teacher Survey for Participation in Focus Groups, Teacher Informed Consent Form
	* Attachment B – Teacher Agreement on Security of Comments Form
	* Attachment C – Parents/Caregivers Letter, Parents/Caregivers Survey for Participation in Focus Groups, Parents/Caregivers Informed Consent Form, Parent or Legally Authorized Representative Informed Consent Form for Student
	* Attachment D – Parents/Caregivers Agreement on Security of Comments Form
	* Attachment E – Moderator’s Guide: Student Focus Groups
	* Attachment F – Student Survey
	* Attachment G – Moderator’s Guide: Parents/Caregivers Focus Groups
	* Attachment H – Parents/Caregivers Survey
	* Attachment I – Moderator’s Guide: Teacher Focus Groups