**Memorandum**

**Date: April 4, 2012**

**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 for MyPlate Elementary School Lesson Plans**

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 formative research to inform the development of MyPlate grades 1 - 6 classroom lesson plans.

The following information is provided for your review:

1. **Title of the Project:** Formative Research for MyPlate Elementary School Lesson Plans
2. **Control Number:** 0584-0524
3. **Public Affected by this Project:** Individuals/Households, and State, Local/Tribal Employees
* Elementary school students in first- through sixth-grade classrooms of schools that participate in the National School Lunch Program (NSLP).
* One-third of students attending the school 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 National School Lunch Program.
* Parent/caregivers (both English- and Spanish-speakers) of elementary school students in schools that participate in the NSLP.
* Participating parent/caregivers will be the guardians/caregivers of the children participating in the elementary school classroom specified above.
* One-third of parent/caregivers attending the schools 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 National School Lunch Program.
* Elementary school teachers who are employed by the schools specified above.

See section 7, *Project Purpose, Methodology & Formative Research Design* for a description of the number of classrooms or focus groups for each audience (students, teachers, and parent/caregivers). The formative research focus groups will be conducted with both English- and Spanish-speaking parents/caregivers.

1. **Number of Respondents:**

The total estimated number of participants is 196: 2 principals, 90 elementary school (grades one through six) students, 90 parents/caregivers of the students,10 teachers, and 4 school food service staff. Responder estimates are based on response rates of 83% for students, 25% for parents/caregivers, 33% for teachers, and 50% for food service staff. The response rate for students is high because curriculum implementation will occur as part of the regular classroom activities.

*Number of respondents*

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| --- | --- | --- | --- |
| **Target audience** | **Total number of participants** | **Proportion of Responders** | **Proportion of Non-Responders** |
| Principal | 2 | 100% (2) | 0% (0) |
| Students (1st-6th grade) | 90 | 83% (75) | 17% (15) |
| Parents/Caregivers  | 90 | 24% (22) | 76% (68) |
| Classroom Teachers | 10 | 30% (3) | 70% (7) |
| School Foodservice  | 4 | 50% (2) | 50% (2) |
| **Total** | **196** | **104** | **92** |

The selected schools' principals (one administrator at each of two school sites) will recruit and obtain consent from a 1st/2nd grade, a 3rd/4th grade, and a 5th/6th grade teacher. Both student and parent/caregiver respondents will be recruited from the selected classrooms to participate in research activities. One parent/caregiver focus group will be held at each of two school sites (two groups total). 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 and a parental consent form to each of his/her elementary school students to take home.
	+ Invitation letters and parental consent forms will solicit parent/caregivers permission for their children to participate in the formative research.
	+ Invitation letters, screeners and consent forms to parent/caregivers will solicit parent/caregivers participation in focus groups.
* Collecting all forms.
	+ Teachers will collect and return screeners and parental consent forms to the evaluation contractor.

*Recruitment*

Three classrooms between the two selected schools (e.g., one 1st/ 2nd grade class in one school and one 3rd/4th grade and one 5th/6th grade class in another school) will participate. Recruitment of parents/caregivers for focus groups will be conducted among parents/caregivers of children in the three participating classrooms. Each classroom is estimated to have 30 students (90 total) so that approximately 90 parents/caregivers will receive a packet with an invitation letter, screener, and parental consent form. Of those packets distributed, it is anticipated that 25% (total= 22) of parents/caregivers will complete and return forms to the classroom teachers, indicating interest in and availability to participate in parent/caregiver focus groups/formative testing. Once completed forms are returned, the evaluation contractor will review them to determine which parents/caregivers 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 and identify Spanish-speaking parents for the focus group To be conducted in Spanish.

Lesson Plan Formative Research

Students in three classrooms across the two schools will complete a pre-test survey (prior to implementation of the MyPlate classroom lesson plans) to establish “baseline knowledge” about MyPlate, the five food groups, and healthy eating habits, as well as current eating behaviors. After the implementation of the MyPlate lesson plans, students will complete a post-test survey to determine student comprehension, changes in behavior and knowledge, and reactions to the lessons.

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| *Student Participants* |
| **Target Participants** | **# of classes** | **# of participants per class** | **Total # of participants** |
| Students in first-/second-grade  | 1 | 25 | 25 |
| Students in third-/fourth-grade | 1 | 25 | 25 |
| Students in fifth-/sixth-grade | 1 | 25 | 25 |
| *Total* | *3* | *-* | *75* |

Parents/caregivers Focus Groups

Qualifying parents/caregivers will be invited to attend a parent focus group. In order to seat eight parent/caregivers at each site's focus group, 10 qualifying parents/caregivers (for each group) will be invited to attend.

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| *Focus Group Participants* |
| **Target Participants** | **# of Groups** | **# of Participants per group** | **Total # of participants** |
| English-speaking parents/caregivers of participating elementary school students | 1 | 8-10 | 8-10 |
| Spanish-speaking parents/caregivers of participating elementary school students | 1 | 8-10 | 8-10 |
| *Total* | *2* | *-* | *16-20* |

Teacher and Relevant School Staff Interviews and Journals

The participating teacher at each site will be invited to participate in a one-on-one telephone interview. In addition, one or two relevant staff at each school – food service management or similar—will also be invited to one-on-one interviews. Teachers will also be responsible for keeping an educator journal where they will record relevant information about each lesson plan.

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| **Target Participants** | **# of Participants** |
| Teachers of a first-/second-grade class | 1 |
| Teachers of a third-/fourth-grade class | 1 |
| Teachers of a fifth-/sixth-grade class | 1 |
| Relevant school staff (food service) | 2-4 |
| *Total* | *5-7* |

1. **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. Principal involvement includes identifying and inviting eligible teachers/classrooms, giving direction to teachers to assist in distributing and collecting parent/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 class, collecting completed forms, and returning completed forms to the principal. Teacher participation also involves keeping a weekly journal and taking part in a 45 minute telephone interview. 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 a parent/caregivers, and returning forms (if completed) to the teacher.

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| *Time Needed per Initial Teacher Recruitment and Consent* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Principals (N=2) | 30 | 0.5 |
| Teachers*(responders, N=3)* | 10 | 0.17 |
| Teachers*(non-responders\*, N=7)* | 2 | 0.03 |

\*It is estimated that 70% of teachers will decline the principal’s invitation to participate.

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| *Time Needed per Initial Parent/Caregiver Screener & Consent Form* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Principals (N = 2) | 10 | 0.17 |
| Teachers (N = 3) | 30 | 0.50 |
| Students (N = 75)(*N=75 responders)* | 10 | 0.17 |
| Students(*N=15 non-responders)* | 2 | 0.03 |
| Parent/Caregiver of elementary school students *(N = 22 responders)* | 10 | 0.17 |
| Parent/Caregiver of elementary school students *(N = 68 non-responders)* | 2 | 0.03 |

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| *Time Needed per Initial Food Service Staff Screener & Consent Form* |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Principals (N = 2) | 10 | 0.17 |
| Food Service Staff*(N = 2 responders)* | 10 | 0.17 |
| Food Service Staff*(N = 2 non-responders)* | 2 | 0.03 |
| *Time Needed per Research Component* |
| **Target Participants** | **Research Activity** | **Time (minutes)** | **Time (hours)** |
| Teachers (N=3) | Educator Journal | 30 | .50 |
| Phone Interview | 45 | .75 |
| Students (N=75) | Pre-test Survey | 17 | .28 |
| Post-test Survey | 23 | .38 |
| Parent/Caregiver (N=22) | Focus Group Interview | 90 | 1.5 |
| Food Service Staff (N=2) | Phone Interview | 45 | .75 |

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



**Total burden hours on public: 107.43**

1. **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), the Department of Agriculture’s Food and Nutrition Service (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 updating the existing MyPyramid Classroom Materials to reflect the switch from the MyPyramid to MyPlate icon. These materials will promote healthy meal selection and consumption, while meeting education standards for academic course content in elementary school (Grades 1 - 6). 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 MyPlate 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) test the lesson plans and provide feedback for its optimization, and (2) inform the development of MyPlate Tips for Families Handout.

The formative research will verify that the lesson plans are behavior-focused, clear, credible, actionable, relevant, and useful to the intended audience and, ultimately, will compel audiences to take action.

The focus groups with parents/caregivers are designed to identify nutrition education messages and content that are engaging and compelling.

Methodology/Research Design

*Formative Research*. The formative research will be conducted with three classrooms. Prior to the implementation of the MyPlate lesson plans, a brief survey (pre-test) will be conducted with elementary school students in two schools in two different areas of the country. After the implementation of the MyPlate lessons is completed, a second survey (post-test) will be administered to participating students. The custom survey—which will take approximately 20 minutes to administer in the classroom—will measure student knowledge about and behaviors relative to selecting and consuming healthy balanced meals.

*Interviews with Teachers, School Food Service*. Interviews with participating teachers will take place by telephone, as will interviews with relevant school food service. Interview duration is anticipated to be 45 minutes, and interview content will focus on:

* Identifying and understanding contextual and other factors that present opportunities and/or barriers to adoption of the MyPlate lesson plans into coursework
* Assessing opinions on the degree of ease with which the MyPlate lesson plans are implemented in the classroom
* Determining teacher perceptions of levels of student interest in and learning from the MyPlate lesson plans

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

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| **School 1** | **School 2** |
| 1 group of parents/caregivers(English speakers) | 1 group parents/caregivers(Spanish speakers) |

Each group will consist of between eight and ten parent/caregivers (total n = 16-20), and will last approximately 90 minutes. The main focus of the parent/caregivers focus groups will be:

* To identify and understand the contextual factors that may engender and/or inhibit parent/caregivers' motivation to act on messages designed to increase the planning, preparation and consumption of healthy, balanced meals at home.
* To assess the appeal, relevance and comprehension of messages and content intended for inclusion in a MyPlate Tips for Families Handout.

Design/Sampling Procedures

The sample will include four different audiences, as described above: elementary school (1st through 6th grade) students; their parents/caregivers, their teachers; and school food service, utilizing purposive and convenience sampling procedures. Both selected schools will participate in the NSLP. 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 National School Lunch Program.

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

Site Selection

Two elementary schools willing to use the lesson plans will be selected. Each school will represent a different USDA FNS region of the country and have more than 33% of the school population eligible to receive free or reduced priced lunches under the National School Lunch Program. 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 group.

Recruitment

With approval from the school site principal, three elementary school classrooms will participate in the recruitment process between the two selected sites. Teachers will distribute packets (containing the letter of invitation, parent screener, and parent/caregivers consent form) to each of their students to take home to their parent/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 parent/caregivers focus groups. The letter will also contain details (description, purpose, length, etc.) about their children's participation in the formative research. Interested parent/caregivers who meet initial criteria (specified in the letter) and are available to participate in focus groups will return the screener to the teachers. Parent/caregivers who are willing to allow their children to participate in in the formative research at school will also complete, sign and return the parents/caregivers consent forms. 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 parent/caregivers to call and invite to participate in focus groups.

Confirmation of Participation

A follow-up letter of confirmation 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 will be made to parents/caregivers a day or two prior to the scheduled dates. Teachers will receive notification from their principals about date and time of teacher telephone interviews. (Dates and times will be decided with input from teachers and will take place after school hours).

Incentives

Parent/caregiver focus group participants will be given $50 as a token of our appeciation. Participating teachers will also receive a cash stipend of $50 for added time to prepare for implementing lesson plans; for parent and child recruitment support; and for participation in teacher telephone interviews after school hours. Food service staff will be given a cash stipend of $25 for their participation in the phone interview. 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 worth no more than $500 for their efforts in supporting the research activities.

Interview and Focus Group Sessions

*Time.* Parent/caregiver and teacher focus groups will last for a total of 90 minutes each. Teacher and school food service interviews will last a total of 45 minutes each.

*Interview Content.* A trained moderator will facilitate interviews/discussions as described in the *Moderator's Guide for Parent Focus Groups, Moderators' Guide for Teachers, Moderator’s Guide for Food Service Staff* as appropriate to the audience.

*Consent.* Teacher and food service staff 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 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. Parent/caregiver consent materials will be made available in Spanish for Spanish-speaking parents.

Data Analysis

*Qualitative Data*. Teacher interviews will be audio-recorded (with respondent permission), and the information collected will be used to inform the optimization of the classroom MyPlate lessons. Educator journals (written in digital form) will be analyzed along with interview information. Parent/caregiver focus groups will be audio-recorded, and information gathered will inform the development of messages and content for the *MyPlate at Home* handout. Focus group respondents will be informed that the sessions are recorded. Notes taken while observing the focus group sessions and audio recordings will be the primary methods of data collection for qualitative data. Recordings 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.

*Survey/quantitative Data*. Completed pre- and post-lesson plan implementation student surveys comprise the quantitative data set. Differences across grade level will be noted as appropriate. Because of the relatively small sample size, 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.

Outcomes/Findings

Information and formative input gathered from specific target audiences through the research will help to understand needs for lesson plan modification (as required) and will identify messages and content that are most effective at motivating the target audience to take action. 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.

1. **Confidentiality**

Using the *Agreement on Security of Comments Form* 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**: $90,924.00
2. **Research Tools/Instruments:**
	* Attachment A: Teacher Letter, Survey for Participation in Focus Groups and Informed Consent Form
	* Attachment B: Parent/Caregiver Letter, Parent/Caregiver Letter, Survey for Participation in Focus Groups, Informed Consent Form for Parent Caregiver and Informed Consent form for Student (*English & Spanish Versions*)
	* Attachment C: Food Service Staff Letter, Survey for Participation in Focus Groups and Informed Consent Form
	* Attachment D1: Pre-Test Survey Instruments for Students - Grades 1 – 6
	* Attachment D2: Post-Test Survey Instruments for Students - Grades 1 – 6
	* Attachment E: Moderator’s Guide for Parent Focus Group – *“MyPlate at Home*” handout (*English & Spanish Versions*)
	* Attachment F: Moderator’s Interview Guide for Teacher – Grades 1 - 6
	* Attachment G: Educator Journal for Teachers – Grades 1 - 6
	* Attachment H: Moderator’s Guide for Food Service Staff