**Memorandum**

**Date: June 3, 2015**

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

**Through: Lynnette Thomas, Food and Nutrition Service, Branch Chief, Planning & Regulatory Affairs; Ruth Brown, United States Department of Agriculture, Office of Chief Information Office, Departmental Clearance Officer**

**From: Alicia White, Branch Chief, Nutrition Education and Promotion Branch, NPTAD, Child Nutrition Programs**

 **USDA – Food and Nutrition Service**

**Re: Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval to Perform Formative Research for Team Nutrition Educational Materials for Summer Meals**

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0524.

This request is to acquire clearance to conduct formative research at summer meal sites to inform the development of nutrition education activities and materials to be used as part of the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) of the National School Lunch Program (NSLP).This research will get target audience feedback on activity guides and promotional materials for summer meal site operators and handouts for parents.The following information is provided for your review:

1. **Title of the Project:** Team Nutrition Educational Materials for Summer Meals
2. **Control Number:** 0584-0524, Expires 06/30/2016
3. **Public Affected by this Project:**

State and Local/Tribal Employees

* Operators of SFSP and SSO sites.
	+ Operators of SFSP/SSO sites that prefer written materials in English.

Individuals/Households

* Children 5-17 years of age participating at selected SFSP/SSO sites.
* Parents/Caregivers (both English- and Spanish-speakers) of children attending the participating SFSP/SSO sites.

See section 7, *Project Purpose, Methodology & Formative Research Design,* for a description of the number of participants for each audience (site operators, children, and parents) by research methodology (journals, focus group interviews, in-depth interviews, pre- and post-test surveys, and taste-test ballots).

1. **Number of Respondents:**

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| --- | --- |
| ***Table 4.1 – Consent Forms\**** |  |
| **Audience** | **Number of Participants** |
| Parents/caregivers of children ages 5-17  | 1,080 |
| Children ages 5-17 | 1,080 |
| Summer meal site operators | 48 |
| **Total** | **2,208** |
| \*Includes non-responders and those choosing not to participate. |

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| ***Table 4.2 –* *Parent/Caregiver Focus Group Participants\*\**** |
| **Audience** | **English Language FGIs (# of Parents)** | **Spanish Language FGIs (# of Parents)** | **Total # of Parents** |
| Parents/Caregivers of children ages 5-17 | 4 (n = 24) | 4 (n = 24) | 48 |
| ***\*\*****Groups will recruit 8 to seat 6 parents.* |
| ***Table 4.3 –* *Site Operator Research Activities*** |
| **Research Activity**  | **# of Site Operators** |
| Implementing nutrition education activities | 12 |
| Site operator journals | 12 |
| In-depth interviews | 12 |
| **Total** | **12** |

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| ***Table 4.4 – Child Research Activities*** |
| **Research Activities** | **Total # of children** |
| Pre-/Post-test surveys | 216 |
| Taste-test ballot | 900 |
| **Total** | **1116** |

1. **Time Needed Per Response:**

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| ***Table 5.1 Time Needed per Initial Recruitment & Consent Form\**** |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| Site Operators | 10 | 0.17 |
| Parents/caregivers of children ages 7-17  | 10 | 0.17 |
| Children ages 5-17 | 5 | 0.08 |
| \*The time is an average response per respondent. |

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| ***Table 5.2 Time Needed for Research Activities by Audience*** |
| **Target Audience** | **Research Activity** | **Time (minutes)** | **Time (hours)** |
| Site Operators | Implementation of activities^  | 540 | 9.00 |
| Site Operator Journal | 60 | 1.00 |
|  | In-Depth Interview | 45 | 0.75 |
| Parents/ Caregivers | Focus Group Interview | 45 | 0.75 |
| Confirmation Letter & Call | 15 | 0.25 |
| Children | Pre-/Post-test surveys | 20 | 0.33 |
| Taste-Test Ballot | 1 | 0.02 |
| ^Estimates based on prep time and implementing 18 activities, as well as administering the taste-test ballots. |

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

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **(a)** | **Respondent Type** | **(b)** | **(c)** | **(d)**  | **(e)** | **(f)** | **(g)** |
| **Affected Public** | **Screeners, Surveys****(Appendices for Data Collection Instruments)** | **No. Respon-dents** | **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** | Summer meals site operators | Consent Forms(Appendix C) | 48 | 1 | 48 | 0.17 | 8 |
| Implementing Activities and Taste Tests | 12 | 1 | 12 | 9.00 | 108 |
| Site Operator Journal(Appendix I) | 12 | 1 | 12 | 1 | 12 |
| In-Depth Interview (Appendix H) | 12 | 1 | 12 | 0.75 | 9 |
| **Subtotal** |  |   | **84** | 1 | **84** | 1.738095238 | **137** |
| **Individuals & Households** | Parent/Caregivers of children ages 5-17 | Consent Forms(Appendices A, B, F) | 1080 | 1 | 1080 | 0.17 | 180 |
| Confirmation letter and call(Appendix G) | 64 | 1 | 64 | 0.25 | 16 |
| Focus Group Interview & Brief Survey(Appendices D, E) | 48 | 1 | 48 | 0.75 | 36 |
| Children ages 5-17 | Consent Forms(Appendix L) | 1080 | 1 | 1080 | 0.08 | 87 |
| Taste-test ballots(Appendix J) | 900 | 1 | 900 | 0.02 | 18 |
| Children ages 7-17 | Pre- & Post-Test Survey(Appendix K) | 216 | 1 | 216 | 0.33\* | 72 |
| **Subtotal** |  |   | **3388** | 1 | **3388** | 0.119244392 | **409** |
| **Total** |  |   | **3472** | **1** | **3472** | **0.158410138-** | **546** |

Note: Appendices M, N, O, P are supplemental materials for implementing activities, but are not used for data collection.

**Total burden hours on public:** 546 hours.

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

Background

As authorized under Section 6(a)(3) of the Richard B. Russell National School Lunch Act, 42 USC 1755(a)(3), the US Department of Agriculture’s Food and Nutrition Service (FNS) provides training and technical assistance for school food service, 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 the Team Nutrition initiative, FNS is developing nutrition education materials designed to: 1) increase awareness of the importance of healthy food and beverage choices and physical activity for children during the summer months; and (2) provide strategies for offering and promoting fun and evidence-based nutrition education activities in conjunction with meals provided through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) of the National School Lunch Program (NSLP). These materials support Team Nutrition’s behavior-oriented strategy of “providing multifaceted, integrated nutrition education for children and their parents.”

Purpose

The purpose of the proposed research is to: (1) verify the materials and activities are easy-to-use, clear, and feasible for site operators, and engaging for children; (2) assess the impact of the materials on children’s knowledge and attitudes related to healthy food and beverage choices and physical activity; (3) assess the impact of the materials on behavioral indicators of children’s healthy food and beverage choices, physical activity, and screen time; (3) assess children’s appeal for original recipes and activities; and (4) identify and understand contextual, logistical, and attitudinal factors that engender and/or inhibit parents’ acceptance of and motivation to act on the information provide in the parent handout.

Methodology/Research Design

This research will utilize four qualitative and quantitative methodologies: 1) surveys; 2) site operator journals; 3) in-depth interviews; and 4) focus group interviews (FGIs). All research activities will be conducted with participants attending 12 summer meals sites across four FNS regions throughout the summer (see Table 7.1 for sample site distribution).

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| ***Table 7.1 Sample Site Distribution and Estimated Attendance by State*** |
| **Site Type (n=estimated children)** | **Region 1** |  **Region 2** | **Region 3** |  **Region 4** |
| School (n=150) | 1 | 1 | 1 | 1 |
| Community-Based Organization (n=100) | 1 | 1 | 1 | 1 |
| Library (n=15) |  | 1 | 1 | - |
| Park (n=50) | 1 |  | 1 | - |

The nutrition education activities and related data collection will vary between 6 to 9 weeks depending on summer meal site schedules.

All site operators (n=12) will implement 15 educational activities and 3 food preparation activities at their respective sites, participate in an in-depth interview, complete site operator journals, and administer taste-test ballots. Children (n=216) will complete surveys (see Attachment K) at the beginning and end of the summer, and approximately 900 children will complete taste-test ballots (see Attachment J) after participating in food preparation activities.

*Focus Group Interviews.* Focus group interviews will be conducted with parents/caregivers (parents) of children attending summer meal sites. A total of eight 45-minute FGIs (see Attachment D) will be conducted with 6 parents in each group (total N=48). Eight parents will be invited to each FGI in order to assure 6 participants are seated. Groups will take place at the SFSP/SSO sites during the hours of operation. Trained research staff will conduct all interviews and focus groups. Parents will also complete a brief worksheet during the FGI to provide specific feedback about the parent materials (see Attachment E).

Groups will be segmented by the primary language spoken at home (see Table 7.2 below)

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| ***Table 7.2* *Parent Focus Group Participants*** |
| **Target Audience** | **English Language FGIs** | **Spanish Language FGIs** | **Total # of Participants** |
| Region 1 | 1 (n = 6) | 1 (n = 6) | 12 |
| Region 2 | 1 (n = 6) | 1 (n = 6) | 12 |
| Region 3 | 1 (n = 6) | 1 (n = 6) | 12 |
| Region 4 | 1 (n = 6) | 1 (n = 6) | 12 |
| ***Total*** | ***24*** | ***24*** | ***48*** |
|  |  |  |  |

The main focus of the parent/caregivers focus groups will be:

* To identify and understand contextual factors that may engender and/or inhibit parent acceptance of and motivation to act upon the educational messages in the parent information.
* To assess the appeal, comprehension, and relevance of nutrition education materials for parents.

*In-Depth Interviews.* In-depth interviews will be conducted with participating site operators (N=12). Interviews with site operators (see Attachment H) will be 45-minutes and focus on the feasibility, barriers, and supports for implementing the education activities as well as identifying the activities that were most engaging for children. Trained research staff will conduct all interviews.

*Site Operator Journals.* Journals will be completed by all participating site operators (N=12) during the course of the formative research period. Site operators will be asked to record feedback on the nutrition education activities conducted. The Journal for Site Operators (see Attachment I) will include personal reflections about the activities, standardized process measures (e.g. length of time), and perceptions of child engagement.

*Surveys.* Pre- and post-test surveys (see Attachment K) will be administered to children over the age of 7 (n=216) at the start and end of the formative research period. Surveys will be administered by trained research staff as one-on-one interviews with children ages 7 or older during the first and last week of the formative research period. The survey is based on validated measures of: a) children’s knowledge and attitudes related to healthy food and beverage choices and physical activity; b) behavioral indicators of children’s healthy food and beverage choices, physical activity, and screen time (e.g. Reynolds, Yaroch, Franklin, & Maloy, 2002; Baranowski et. al, 2000). Though these measures were validated with children ages 9 and older, children ages 7 or older will be eligible to complete surveys, as the survey will be read to children by trained research staff. However, children ages 5 and 6 will not complete surveys because many of the questions require respondents to accurately recall past behaviors and time, concepts that are still developing in young children (e.g. CM Roebers, N Moga, W Schneider, 2001).

*Taste Test Ballot.* Site operators will also ask at least 25 children to complete a taste test ballot after each food preparation activity using digital surveys on iPads (see Attachment J). Participating children will be asked to rate the taste, appearance, and smell of the recipe using visual symbols. No identifying information will be collected from children completing the brief taste-test ballot.

Design/Sampling Procedures

The sample will include three different audiences as described above: summer meals site operators, children ages 5-17 attending selected summer meals sites, and parents of attending children ages 5-17. All 12 sites will be recruited utilizing purposive and convenience sampling procedures. Sites will be selected that serve racially and ethnically diverse communities.

Qualifying parent/caregivers will be those whose children attend the selected SFSP sites. Only one parent/caregiver per child will be allowed to participate.

Site Selection

Twelve SFSP/SSO sites will be selected from four different FNS regions such that, using publically available census data, the full sample represents the racial/ethnic diversity of children living in low income households (185% of the federal poverty rate). The formative research will focus on SFSP/SSO sites in schools, community based organizations (CBOs), parks, and libraries, as these generally have more consistent attendance and are led by trained staff (Community Food Advocates, 2012). Sites recruited from four FNS regions to allow for geographic diversity and the inclusion or urban, suburban, and rural locations.

Recruitment and Consent

SFSP/SSO sites will be selected in collaboration with FNS based on site operator’s willingness, capacity, and enthusiasm to conduct the activities. Site operators will be provided with a consent package that includes a letter of invitation, a description of the formative research, and consent form (see Attachment C).

Research professionals will visit each site during the first weeks of the formative research period to distribute consent forms and conduct pre-test surveys with children. The varied timeframe of SFSP/SSO in each region will allow research staff to stagger the recruitment and attend all sites in person.

Both children and parent respondents will be recruited from the SFSP/SSO sites. Parents attending the SFSP/SSO sites with their children will be provided with an active consent package (see Attachment A), which includes detailed study information and consent forms. Those children attending SFSP sites without parents will be provided with a passive consent package (see Attachment B) to take home to their parents, which will also include detailed study information and an opt-out consent form. Parents will be instructed to directly contact the research team or return the form to the SFSP site within 36 hours of receiving it, indicating that they do not want their child to participate. After 36 hours, it will be assumed that parents who do not indicate otherwise have provided consent for their child to participate.

The passive opt-out approach will be used as children may attend SFSP sites without parental supervision and will not attend consistently. Further, unlike during the school year, parents may not expect to receive paperwork from SFSP sites and may be unlikely to return optional paperwork. This approach to obtaining passive consent is often utilized when research activities are non-invasive and/or when parents may be difficult to reach.

Parental consent will not be required for children to complete a taste-test ballot as no identifying information will be collected from participating children. The site operators will administer these ballots as part of the education activities and requiring them to track consent will be a prohibitive burden given the brief meal service period and irregular attendance at SFSP/SSO sites.

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 study and the addition of the passive consent option. Parent/caregiver consent materials will be made available in Spanish for Spanish-speaking parents.

If parents are interested in participating in the focus group, they will complete a brief survey as part of the consent package (see Attachments A and B) to ensure that focus groups are representative of the racial and ethnic diversity of families participating in the SFSP/SSO and to identify Spanish-speaking parents for the focus group to be conducted in Spanish. Qualifying parents will be asked to provide contact information for group scheduling purposes. In addition, parents attending the summer meals sites the day focus groups are scheduled will be provided with the consent package and invited to participate in the focus groups. This recruitment method will only be utilized if there are concerns about seating 6 parents in the focus group.

All children whose parents have provided active or passive consent will be asked to provide verbal assent to participate in the research activities (pre and post-test surveys and taste test) (see Attachment L). Parents are eligible to participate in the focus groups even in their children do not participate in the study. Additional parents may be recruited using an informational flyer (see Attachment F) that will be given to attending children. This method will only be used if the recruitment methods described above fail to yield adequate participation.

Confirmation of Participation

A follow-up of confirmation will be emailed to parent/caregivers who have agreed to participate in focus groups (see Attachment G). The email 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 Attachment G) will be made to parents/caregivers a day or two prior to the scheduled dates. Site operators will receive notification from the researcher about date and time of the site operator interviews. Child interviews will be scheduled on the day of attendance for those whose parents provide active consent. Children who are provided with a passive consent package will have a 36-hour grace period for parents to opt them out of the study.

Respondent Costs

Each site operator will receive a stipend of $360 to cover the cost of materials necessary to conduct the 15 educational activities and 3 food preparation activities. This stipend is designed to assure that a variety of summer meal site locations may participate during the study timeframe regardless of their existing materials and resources (see Attachment Q for a detailed discussion of this amount).

Parent focus group participants will be provided with a hot meal, as the focus groups will take place during lunch while children are participating in summer meal site activities. The meal will be arranged by the research staff and is valued at $8 per participant.

Data Analysis

*Qualitative Data*. All site operator and child 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 site operator 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 child pre- and post-test surveys 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. Research summary findings may be published 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.

**Federal Costs**: $143,936.32

1. **Research Tools/Instruments:**
	* **Attachment A:** Active Consent Package for Parents/Caregivers (English and Spanish): Parent/Caregiver Letter, Parent/Caregiver Informed Consent Form for Child Participation, Informed Consent Form for Parent/Caregiver Focus Group, and Survey for Participation in Parent/Caregiver Focus Group
	* **Attachment B:** Passive Consent Package for Parents/Caregivers (English and Spanish): Parent/Caregiver Letter, Parent/Caregiver Passive Consent Form for Child Participation*,* Informed Consent Form for Parent/Caregiver Focus Group, and Survey for Participation in Parent/Caregiver Focus Group
	* **Attachment C**: Consent Package for Site Operators: Site Operator Letter/Script,Informed Consent Form for Site Operators, and Survey for Site Operators
	* **Attachment D**: Moderator’s Guide for Parent/Caregiver Focus Group
	* **Attachment E:** Worksheet for Parent/Caregiver Focus Group
	* **Attachment F:** Focus Group Flyer for Parents/Caregiver
	* **Attachment G:** Parent/Caregiver Follow Up Letter and Phone Script
	* **Attachment H**: Individual Interview Guide for Site Operators
	* **Attachment I**: Journal for Site Operators
	* **Attachment J**: Taste Test Ballot and Site Operator Script
	* **Attachment K**: Child Survey
	* **Attachment L:** Verbal Child Assent Script
	* **Attachment M**: Operator Booklet
	* **Attachment N**: Operator Activity Guides
	* **Attachment O**: Promotional Materials
	* **Attachment P**: Family Activity Guides
	* **Attachment Q**: Site Operator Stipend Justification