

Memorandum

Date: January 25, 2021

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

Through: Rachele Ragland-Greene, Information Collection Officer, Planning and Regulatory Affairs Office, Food and Nutrition Service
Ruth Brown, Departmental Clearance Officer, Office of the Chief Information Office, USDA

From: Usha Kalro, Nutritionist, SNAP Program Accountability and Administration Division, Food and Nutrition Service

Re: OMB Clearance No. 0584-0606; Expiration 03/31/2019
Request Approval for Developmental Field Test Research of Nutrition Education and Promotion Toolkit for Teens

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA) is requesting approval to conduct a field test that is integral to developing a Nutrition Education and Promotion Toolkit for Teens under Approved Generic OMB Clearance No. 0584-0606, Generic Clearance to Conduct Formative Research.

The information to be collected is critical for pilot testing the draft curriculum developed as a component of this toolkit. The Teen Nutrition and Physical Activity Program/USDA Program for High School Students curriculum, (hereafter referred to as the Program) is included as Attachment G.

While most SNAP-Ed (SNAP Nutrition Education) efforts target mothers and children who are elementary-school age or younger, this project addresses an educational gap among low-income high-school age teens. This program is intended to educate, engage, and motivate high school students to adapt healthy choices, consistent with the current Dietary Guidelines for Americans and MyPlate.

Specifically, under this OMB Clearance, FNS seeks to conduct focus groups and on-line surveys with Program participants as part of a small scale pilot.

The curriculum will be implemented in four school districts, with 11 teachers, for 250 students, as shown in the following table:

	Washington, DC (125 students)	Florida (125 students)		
School District	Washington, DC Public Charter Schools	Bradford County School District	Pinellas County School District	Orange County School District
Participating Schools	Thurgood Marshall Academy	Rainbow Center	Bayside High School	Ocoee High School
Number participating classes	5 classes	2 classes	1 class	2 classes
Number	2 teachers	3 teachers	3 teachers	3 teachers

participating teachers				
Number participating students	125 students	50 students	25 students	50 students

This is the second step in a two-part research effort to inform the development of curriculum to teach teens about the importance of healthy eating and of being physically active. In the prior step, we conducted focus groups among 10th to 12th grade high school teens and teachers in locations across the U.S. to understand more fully their attitudes, behavior, and challenges when it comes to engaging educational practices and daily nutrition and physical activity choices (OMB Clearance Number 0584-0606 03/31/2019). That research provided guidance for the development of the curriculum to be pilot tested.

The primary purpose of the proposed field test is to identify potential weaknesses and any needed changes to the curriculum content and approach. For the proposed pilot test, using Attachments (A-G), we along with our contractor, KRC Research, will collect information before and after the curriculum is delivered through student surveys and focus groups with teachers and students.

Student surveys are intended to identify the areas and extent to which the curriculum affects relevant knowledge, motivation, self-efficacy and behavior. Students will also provide information about their pre-implementation expectations and post-implementation satisfaction. Student focus groups, prior to the start of the Program will examine views on making healthy food and physical activity choices, factors that influence their choices, and their expectations about participating in a new class. After they complete the Program, student focus groups will examine reactions to specific content and approach, satisfaction and perceived usefulness, along with interest in applying what they learned into their daily lives.

This package includes all the instruments associated pre- and post-implementation data:

- Attachment A: Quantitative Evaluation Survey for High School Students
- Attachment B: Moderator PRE-Discussion Guide for Focus Groups with High School Students
- Attachment C: Moderator POST-Discussion Guide for Focus Groups with High School Students
- Attachment D: Moderator PRE-Discussion Guide for Focus Groups with High School Teachers
- Attachment E: Moderator POST-Discussion Guide for Focus Groups with High School Teachers
- Attachment F: Parent/Guardian Consent Form for Student Focus Group Participation
- Attachment G: Teen Nutrition and Physical Activity Program

The following information is provided for your review:

1. **Title of the Project:** Nutrition Education and Promotion Toolkit for Teens – Developmental Pilot Testing
2. **Control Number:** 0584-0606 Expires 03/31/2019
3. **Affected Public:** 1) State, Local, and Tribal agencies (Respondent Types: 11 High School Teachers) and Individuals and (2) Households (Respondent Types: 250 High School Students in grades 9-12 and 45 Parents of a subset of these High School Students)
 - a. High school teachers and staff who implement the Program (Attachment G) during the Fall semester, 2016. They will participate in a teacher training session (Attachment G, Program Introduction, pps. 3-10), which is not part of our research, before Program implementation, as well as in research focus groups (Attachments D-E), both before and after implementation.
 - b. High school students who are enrolled in the above-referenced Program will participate in quantitative surveys (Attachment A) before and after Program implementation as part of class time, and some of them will also participate in focus groups (Attachments B-C), both before and after Program implementation, outside of class time as an extracurricular activity.
 - c. Parents and guardians of some high school students enrolled in the Program will be asked to give their written consent (Attachment F) for their teen to participate in the above-referenced focus groups as an extracurricular activity.

See Section 7, *Project Purpose, Methodology and Formative Research Design* for a detailed description.

4. Number of Respondents:

The target populations for this developmental research consist of 250 high school students, enrolled in the class and surveyed as part of the classroom activities, the parent or guardian of 45 of these students who will also participate in focus groups, and 11 high school teachers and staff delivering the curriculum.

The estimated number of individuals by audience who will participate in the pilot test is:

Total Number of Participants: 306

Target audience	Methodology	Number of participants
High school students participating in Program	Pre- and post- surveys	250 students p/wave (same students both waves)
	Pre- and post- focus groups	45 students p/wave (same students both waves), drawn from 250 above
Parents/guardians of high school students participating in Program	Review and sign consent forms for student focus group participation (1 consent form for both waves)	45 parents/guardians of students above
High school teachers/staff	Pre- and post- focus groups	11 teachers p/wave (same teachers both waves)
Total		306 unique individuals

Above, it is assumed that:

- 1) All students participating in the Program (250) will take the survey at the start and upon completion of the Program (10 classes x 25 students). Because the survey is part of the coursework (either as an in-class exercise or as an out-of-class homework assignment), the contractor will not seek parental consent for survey completion.
- 2) Of the 250 participating students, 45 will participate in two focus groups each. Student focus groups will occur on campus, at school, either during the school day or immediately after school. The focus groups are an extracurricular activity – an opportunity to shape the development of a new curriculum. There will be five groups of students who each participate in pre- and post-implementation focus groups. The same students will participate in **both** the pre- and post-focus groups.
- 3) Because the focus groups are an extracurricular activity, the contractor will seek parental consent for student participation. All parent/teen pairs will be given one consent form to sign for both the pre- and post-implementation focus groups.
- 4) Teachers and staff who are delivering the curriculum will make up two different groups – one for the D.C. school and a second for the three Florida high schools combined. Each group will participate in both pre- and post- focus group discussions.

5. Time Needed Per Response:

The time shown in the table below is the average and total time anticipated for each parent/guardian contacted to read and sign the consent form for student focus group participation. A single consent will cover each student’s participation in both the pre- and post-focus groups.

Time needed per person for focus group consent form

Target audience	Data collection activity	Number consent forms p/parent/guardian	Time (minutes) p/person	Time (hours) p/person
Parents/guardians of high school students	Sign focus group consent form	1	15	.25

The time shown in the table below is the time estimated for each participating student to complete the pre- and post-Program surveys, as well as to participate in the pre- and post-Program focus groups.

Time needed per student participating in the surveys and focus groups.

Target audience	Data collection activity	Number pre and post occasions by type of data collection p/student participating	Time (minutes) p/person	Time (hours) p/person
High school students (grades 9-12)	Survey	2	40 min. total/20 min. each survey)	.666 hr. total/.333 hr. each survey
High school students (grades 9-12)	Focus group	2	180 min total/90 min. each group)	3 hr. total/1.5 hr. each group

The time shown in the table below is the complete time for each teacher who participates in focus groups.

Time needed per teacher and staff for focus group participation

Target audience	Data collection activity	Number of occasions by activity p/teacher participating	Time (minutes) p/person	Time (hours) p/person
Teachers and teaching staff	Training session	1	120 min. total	2 hr. total
Teachers and teaching staff	Focus group	2	180 min. total/90 min each group	3 hr. total/1.5 hr. each group

6. Total Burden Hours for Public

The table below describes the total burden hours for affected individuals to complete research activities.

Per person and total time needed by respondent type and data collection activity

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	
Affect- ed Public	Respond- ent Type	Research Activity/ Instruments	Sample Size*	Total No. Respond- ents	Freq- uency of Respon- ses	Total Annual Responses	Average Hours per Response	Total Burden Hours	
Individuals and Households	High school students	Pre-Curriculum Survey	250	250	1	250	0.333	83.25	
		Pre-Curriculum Focus Groups	45	45	1	45	1.5	67.5	
		Post-Curriculum Survey	250	250	1	250	0.333	83.25	
		Post- Curriculum Focus Groups	45	45	1	45	1.5	67.5	
	HIGH SCHOOL STUDENT TOTAL BURDEN HOURS								301.5
	Parents and guardians of high school students	Consent Form for Focus Group Participation	45	45	1	45	0.25	11.25	
		PARENT/GUARDIAN TOTAL BURDEN HOURS							
Sub-total of Participants (Parents and Students)			295	295	2.1525	635	0.4925	312.75	
State, Local or Tribal Agencies	High school teachers, staff	Pre-Curriculum teacher training	11	11	1	11	2.0	22.0	
		Pre-Curriculum Focus groups	11	11	1	11	1.5	16.5	
		Post-Curriculum Focus Groups	11	11	1	11	1.5	16.5	
		HIGH SCHOOL TEACHER TOTAL BURDEN HOURS		11	11	3	33	1.666	55
ESTIMATED GRAND TOTAL BURDEN HOURS FOR ALL AUDIENCES			306	328	2.0365	668	0.5505	367.75	

*We are not conducting a random sample survey, but rather a census of all pilot test student participants. See Data Collection and Timeline, Student Survey, for more explanation.

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

Background

Obesity and weight-related illnesses cost the United States an estimated \$150 billion per year—more than the annual budgets of the Departments of Education, Veterans Affairs and Interior combined. The U.S. Department of Agriculture’s Food and Nutrition Service is at the front lines of this battle. FNS has the difficult task of helping to end hunger and obesity through the administration of 15 federal nutrition programs, including school meals, the

Supplemental Nutrition Assistance Program (SNAP) and Women, Infants and Children (WIC). FNS also educates a vast audience, from school children to SNAP recipients, about the nutrition and physical activity goals promoted by the U.S. Dietary Guidelines and depicted in the MyPlate image.

Like many public health problems, obesity and overweight have their roots in childhood and adolescence and strike low-income groups hardest. This research seeks to test a high school-based health, nutrition, and physical activity Program developed based on research from our earlier set of focus groups among high school students and teachers. To review the curriculum, see Attachment G.

The Program curriculum will be taught--and tested—as a part of **health and nutrition classes** that already exist. Within the District of Columbia and Florida, administrators and teachers associated with participating schools have welcomed and agreed to test this new FNS Program for high school teens in a **small scale pilot project**.

The ultimate goal of the Program is to provide information, increase motivation and teach healthy eating and physical activity skills that are likely to lead to a healthier future for both individuals and the larger American population. A healthier population will reduce challenges and costs associated with the early onset of preventable chronic diseases in which food and exercise can play a positive role.

Research Purpose

The fundamental purpose of this research is to assess the influence of the Program on different dimensions of teen food and activity choices. In addition, the pilot test will assess customer reactions – students and teachers -- to the Program unless teachers are satisfied with the curriculum, and students find it relevant and appealing, it will not be adopted for classroom use. Our prior qualitative research suggests students are interested in learning how to make smart choices, but seek a stimulating and engaging way to learn. For teens that involves peer-to-peer friendly competitions and making, trying and eating healthy foods from across cultures. The information obtained from this pilot test will be used to modify the curriculum, as needed, to ensure that the Program achieves its goals.

Methodology and Research Design

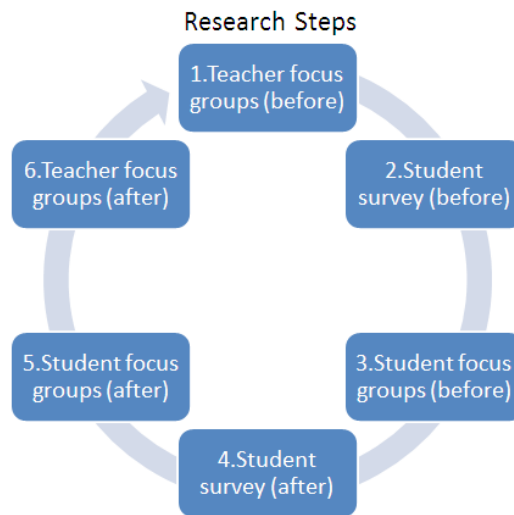
The basic research approach relies on mixed methods data collection with a pre/post-test design. In this real-life test, high school teachers will adopt, implement, and adapt the curriculum and its content to their unique environments, with students participating in and helping co-create the Program.

In addition, both student surveys and focus groups will measure expectations and experience as a way to provide some context for observed student outcomes.

A brief description of how the design and each data collection activity contribute to the test purpose follows:

- **Teacher Focus Groups** are the means to assessing how the curriculum was implemented across different settings, identifying challenges encountered and finding solutions to avoiding or resolving them. Teacher input is likely to affect not just the content of what is conveyed to students but also Program guidance to teachers on both preparation and delivery.

- **Student Survey** will identify the kinds and extent of student changes that coincide with participation in the Program. Outcomes include attitudes, knowledge, and behavioral intent. Survey data also will provide a way to measure general satisfaction with and perceptions about the Program.
- **Student Focus Groups** offer the context for better understanding observed student outcomes and their relationship to different aspects curriculum and implementation. For example, student will be asked what they thought was valuable, what worked, and what didn't work.



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The following material provides more detail about the three elements of our data collection plan.

Student survey. The student questionnaire (Attachment A) will be administered using an online survey research platform, set up and managed by the contractor, KRC Research. KRC will provide teachers with a link to the survey, which they will provide to their students at pre and post data collection points. (See Attachment A, Appendix B, for screenshot of the survey landing page. The full survey shown in Attachment A will be fully programmed when FNS receives OMB approval to proceed.)

The survey instrument is structured so that when students put the survey address in their web browser from a desktop or laptop, it will be readily available in an easy-to-use visually appealing and secure format. Students will also be able to access the survey on a mobile device. However, they will be instructed that if they choose to use a mobile device to complete the survey, they will not be reimbursed for any user charges. The first questions are welcoming and screening questions to verify the appropriate students are participating. Students must get the location/high school/grade/class name correct in order to proceed and participate in the survey.

Student names will be collected at the end of each survey wave for the purpose of validating each record with Program teachers.

All data will be securely held by our contractor, KRC Research. KRC has signed a non-disclosure and data security agreement as part of their contract (see Attachment I). No individual record with identifying personal information (name) will be released to FNS or anyone, outside this study, except as otherwise required by law. Records will be numbered and matched from pre- to post-measure. After the records have been validated, the personal names and personally-identifying information (grade, school, and class) will be permanently removed from the records and destroyed after the conclusion of this study. The dataset, without any personally-identifying information, will then be made available to FNS. The student survey will measure personal values and perceptions, skills, self-efficacy, and behavioral intent with respect to food and physical activity choices.

More specific survey topics include:

- Importance of healthy eating and physical activity to overall well-being;
- Awareness of what makes food healthy and how to identify healthy food;
- Comprehension of SuperTracker (OMB# 0584-0535; Expiration date: 9/30/2018) to create a Food Plan and ability to use Food Tracker to record eating habits over a period of time;
- Confidence in navigating a grocery store on a budget while maintaining good health;
- Ability to read and understand the key features of a food label;
- Understanding of the benefits of physical activity and the wide variety of physical activity;
- Interest in eating healthy and participating in regular physical activity;
- Confidence and ability to eat a balanced diet and get regular physical activity;
- Future intent to choose healthier foods and increase levels of physical activity.

Student focus groups. A sample of students from each school--half girls and half boys-- who participate in the Program will be selected by teachers. Teachers for each class will base selection on identifying students who can represent the voices of their class. Students will represent a mix of interests, from those who are not interested in nutrition and/or physical activity to those who express keener interest in these subjects. Teachers will also take into account the likelihood that the students selected will participate in the discussion and attend both pre- and post-program focus groups. Teachers in school will select a total of nine students. There will be no replacement for the post program focus groups if students drop out of the class. Focus groups will be conducted on-site at each of the four schools.

In the pre-implementation focus groups, the focus of the discussions will be on students':

- Attitudes and opinions about healthy eating and physical activity;
- Specific Program topics of interest; and
- Expectations about what they will learn.

In the post-implementation focus groups, the following topics will be explored:

- Program likes and dislikes; views on what worked well and what could be improved;
- Reaction to specific lessons and activities that make up the core of the curriculum;
- Perceived changes in their own knowledge of, interest in, likelihood of adopting healthy choices both during the semester and once the program ends; and
- Ideas for and pro/cons of potential program names

Teacher focus groups. Teachers and staff who implement the Program will participate in pre- and post-implementation focus groups.

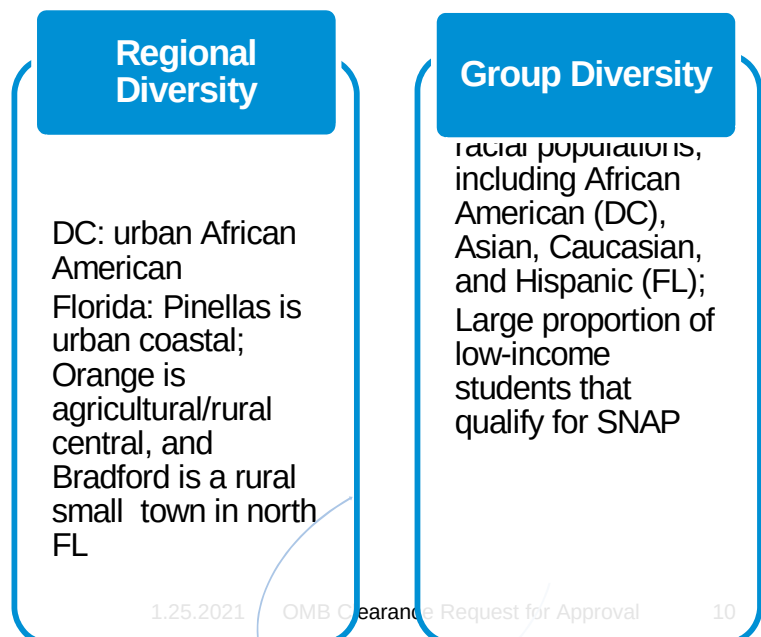
- We will create two groups of teachers and teaching staff, one in Washington, DC and one in Florida. The same teachers will participate in the pre-and-post Program focus groups.
- In Washington, D.C., teachers will be implementing the Program directly. In Florida, teachers will be advising and supporting Program Assistants from the University of Florida's (UF) Institute of Food and Agricultural Sciences. It is the latter, Program Assistants, who will be implementing the curriculum in school classes.

- Teachers and Program Assistants implementing the Program will gather together in one D.C. and one Florida location for teacher training before the Program starts. We will conduct both pre-test focus groups in-person.
- At the conclusion of the Program, we will meet in-person with the Washington, DC teachers for a post-implementation focus group. Florida teachers and UF Program Assistants will not be in the same location at the conclusion of the Program. For this group, the focus group discussion will take place over the telephone. (See Attachment E.)
- In the pre-implementation focus groups, the discussions will focus on students' attitudes and opinions about healthy eating and physical activity. They will also describe their prior experience teaching healthy eating and physical activity curriculum/a and their expectations for this Program. Specifically, the following topics will be explored:
 - o Current student mindset on nutrition and physical activity;
 - o Current student behaviors around nutrition (including grocery shopping and cooking) and physical activity;
 - o Student and teacher reactions and expectations about Program; and
 - o Challenges and motivation around teaching health and nutrition subjects for teachers.
- In post-implementation groups, the general focus will be on the degree to which the program met their expectations, the relative value of the Program, satisfaction with it, and recommendations for future use. Specifically, the following topics will be explored:
 - o Student engagement levels in the curriculum;
 - o Ease of implementation and use of the curriculum;
 - o Overall value of the curriculum; and
 - o Willingness and enthusiasm surrounding future implementation of the curriculum.

Site Selection and Recruitment of Participants

As described above, the Program will be tested in 4 high schools:

- [Orange County](#), Florida (northwest of Orlando);
- [Bradford County](#), Florida (between Jacksonville and Gainesville, FL);
- [Pinellas County](#), Florida (west of Tampa and north of St. Petersburg); and
- [Washington](#), District of Columbia (Southwest, historic Anacostia)



To identify schools willing to participate, the contractor, Weber Shandwick, worked with FNS. The contractor systematically talked with SNAP-Ed program staff and member of a group of technical experts to gather insights into the low-income teen population and to identify areas of the country that work with teens and more likely to be interested in this project.

From that outreach, the team assessed geographic and student population diversity and honed in on Florida and DC as potential pilot project sites. Conversations with the UF and a former DC school official resulted in the identification and recruitment of the schools listed here.

These schools were recruited because (a) they all have a large percentage of high school students from low-income families that qualify for SNAP-Ed--that is, the majority of participants in selected schools are from households with incomes at 185% of Federal Poverty Level (FPL) or below; (b) because collectively they provide both multi-ethnic and geographic diversity; and (c) they are willing and enthusiastic about implementing the pilot test during the required time frame.

Willingness and enthusiasm for the project have been key because neither the individual schools, the UF nor students are receiving any financial assistance or reward for participation. These partners have already invested substantial planning time and indicated their commitment to implementing the project in the Fall, 2016.

Students, as part of their high school class requirements, will be either (a) choosing the class in which our test Program will be taught, or (b) attending a required/assigned class in which our test Program will be taught. Thus, they are not being "recruited" in the traditional sense of the term--they are part of an already-existing class. Because of this arrangement, there is not a need for "opt-out" forms. Student survey participation, as indicated previously, will be integrated with class enrollment.

Teachers and students who are part of Program implementation during the 2016 Fall semester represent the research universe.

Data Collection and Timeline

The target dates for implementation are aligned to the start of the 2016/2017 school year in both the Washington, D.C. and Florida locations. We expect to begin the data collection in August of 2016 and finish in December of 2016.

Student Survey. As previously stated, we will conduct a survey that is a complete enumeration of all student Program participants. The pre- and post-Program implementation surveys are a requirement of participating in the class. The surveys will be administered in class, as part of classwork or as a homework assignment, by the teacher. When teachers make the assignment, they will provide students with the link to the questionnaire. We are collecting student names in the survey, and we will coordinate with teachers to verify all students have participated.

A very similar survey instrument will be used for both the pre- and post-surveys (see Attachment A). The post-survey is identical to the pre-test survey except of the addition of questions 61-62, 77-73). These additional questions for the post survey are marked in the instrument as POST SURVEY ONLY.

The questionnaire was developed in two steps. First, the research team established set of evaluation metrics corresponding to the Program objectives (see Appendix A, at the end of this document). Next, the team developed a set of questions that combine the metrics with key nutrition and physical activity topics included in the Program.

The estimated time to complete the questionnaire is based on consultations with research firms who are familiar with both online survey research and the target audience. The KRC research team will program and host the survey using the secure Qualtrics platform. The design is professional, attractive and easy for respondents to use on a computer. The link to the survey will be distributed by the teacher to students during the school day. Depending on the teacher's decision, students will complete the survey in class or as a homework assignment. At the beginning of the survey, students will answer a few screening questions for verification and classification. (See Attachment A, questions 1-3a).

Focus Groups. Teachers in each school will choose a total of nine students from across classes to participate in one focus group at each school, as an extracurricular activity. The students who participate in the focus groups will provide contextual information about their experience participating in their nutrition and physical activity class, to supplement quantitative data from the pre- and post-surveys. We believe it is important for the teachers to make student selections based on their knowledge and experience.

Given that teachers will ask students to participate, we expect a very high response rate. However, students will initially have the option to decline. If a student declines, the teacher will then select another student prior to the pre-test. By conducting the focus groups at a convenient time during the school day or immediately after school, we expect to minimize the number of students who are unable to participate. Furthermore, parents will be provided with a Consent Form, included in our Package (Attachment F). They have the option to opt-out for their student. Based on our experience in conducting commercially-recruited students into focus groups, the number of parents declining is very low because the topic is not considered controversial. If any students who participate in the first set of focus groups cannot participate in the post-groups at the end of the year, we will not replace them with others. We believe it is important to have students who participate in both groups.

Each focus group will last 90 minutes. Participants will be informed that their session is being audio-recorded. We anticipate conducting the focus groups in late August/early September and December 2016. The moderator's discussion guides (Attachments B-C) will serve as a tool to facilitate the focus group discussions. Materials that will be presented to focus group participants can also be found in the discussion guides.

Data Analysis

Student Surveys. The KRC research team will monitor data quality during data collection. Upon completion of the pre-Program survey, we will review data quality in great depth. In this step, we will:

- Examine patterns of potential response bias, such as individual records in which students established a pattern of clicking the same response category over and over ("flat-liners"). To assess the degree to which respondents are reading each item, a quality control question (#28) is included that instructs respondents to choose answer option "false;"
- Sort and code open-ended responses, and run preliminary tabulations of all survey data;
- Examine and validate data and tabulations;
- Prepare demographic profiles students by school, geographic region and in total; and

- Prepare a descriptive analysis plan with intended cross tabulations. This plan will include both subgroup analyses and other comparisons to reflect the outcomes of different implementation situations, e.g., total class time. The plan will include:
 - A questionnaire with a format to record the means and response distribution for each item, pre- and post-implementation; and
 - A set of proposed tables for presenting analysis results.

Focus Groups. Upon completion of the focus groups, audio recordings will be transcribed without the names of individual respondents. Transcripts will be sorted by location and examined for recurring themes, and differences across groups noted where appropriate. Given the qualitative nature of the focus groups, as well as the relatively small number of participants, results will be considered descriptive and directional. Their primary purposes are 1) to add context and explanatory power to understanding student outcomes and 2) identify improvements to the curriculum.

Based on the analysis described above, both findings and recommendations for further Program development will be presented in a report for FNS. There is no intent to generalize the results to a nationally representative audience.

Desired Outcome

The data gathered in this research will help FNS understand the challenges and opportunities surrounding the promotion of health, nutrition, and wellness among high school students and, in turn, inform the development of the **“Teen Nutrition and Physical Activity Program for High School Students.”** Conversations with teachers will provide a means of validating and elaborating on information provided by teen participants. It will also provide insights on how to make the material user-friendly, valuable, and generally appealing to teachers. FNS may choose to share the findings in a variety of public forums, such as the Agency web-site, briefings and conference presentations or a peer-reviewed journal.

Confidentiality and Data Security

Using the language provided in the attached instruments, respondents will be informed of applicable confidentiality and Privacy Act provisions at the start of each data collection occasion. The System of Record Notice USDA/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. The contractor has signed a data security and confidentiality agreement as part of its contract.

KRC Research understands the importance of confidentiality and privacy. KRC routinely partners with clients with heightened security requirements, such as governments, healthcare companies, and financial services organizations.

First, we carefully observe all non-disclosure agreements. Even in the absence of explicit non-disclosure contracts, we never share client documents or research results without client permission. This is at the core of KRC’s employee Code of Conduct, which all employees sign annually and which is the subject of annual online training.

Second, we provide privacy and anonymity of our research respondents (consistent with research industry codes of conduct). For example, access to data files used for sampling is

generally limited to supervisors, and individual-level personally identifiable information is removed from files before they are transmitted, except as otherwise required by law.

Third, KRC's data security protocols include storing electronic materials in password protected files on KRC servers, utilizing secure file transfer, secure data repositories, ensuring third-party data processors are bound by appropriate confidentiality obligations and procedures, and removing personally identifiable information from data files upon completion of projects.

Next, from an IT standpoint, rigorous procedures and policies are in place throughout our organization to ensure our systems are up-to-date and secure. Below is a snapshot of our technology security policies and procedures:

- All PCs and servers have centrally managed enterprise level anti-virus software running at all times;
- All incoming e-mail messages and attachments are scanned for viruses;
- Anti-virus scans of all files on local drives are performed daily;
- Anti-spyware is installed on all PCs and workstations and hard drives are scanned daily for anti-spyware software;
- All access points to our network are approved and have an associated risk assessment;
- All external access to our company network is controlled through a firewall which among other purposes denies all inbound and outbound traffic without business purposes;
- Cryptographic standards are in place for the protection of information;
- All workstations and laptops are encrypted with AES 256-bit level whole disk encryption;
- Intrusion detection technology is used at the network level;
- A documented information systems business continuity and disaster recovery plan is in place;
- Individual accounts are established for each employee that are password protected;
- Passwords are changed at least every 60 days and have multiple levels of complexity;
- All policies are consistent with government laws, regulations and directives.

Our vendors also have firewalls and these kinds of IT security policies, and we are always happy to reconfirm these policies in advance of any project.

8. Federal Costs:

The original estimated cost to the government for conducting the proposed survey and focus groups will be approximately \$171,975.50. This estimate includes all subcontract direct and indirect costs associated with the pilot test.

9. Research Tools/Instruments:

- Attachment A – Quantitative Evaluation Survey for High School Students
- Attachment B – Moderator PRE-Discussion Guide for Focus Groups with High School Students
- Attachment C – Moderator POST-Discussion Guide for Focus Groups with High School Students
- Attachment D – Moderator PRE-Discussion Guide for Focus Groups with High School Teachers
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- Attachment G –Teen Nutrition and Physical Activity Program

APPENDIX A: KEY EVALUATION CATEGORIES & METRICS

Metrics	Nutrition	Physical Activity
Content Metrics – Survey Content		
<p>Values, perceptions, and attitudes</p> <p>Nutrition Questions: 4 – 13</p> <p>Physical Activity Questions: 14 – 22</p>	<ul style="list-style-type: none"> • Consider healthy eating personally very important to overall well-being: <ul style="list-style-type: none"> • Healthy eating helps me build my future • Healthy eating is important to me 	<ul style="list-style-type: none"> • Consider physical activity personally very important to overall well-being <ul style="list-style-type: none"> • Physical activity helps me build my future • Physical activity is important to me
<p>Knowledge (key concepts) and related skills</p> <p>Nutrition Questions: 23 – 43</p> <p>Physical Activity Questions: 44 – 53</p> <p>Lessons Covered:</p> <ul style="list-style-type: none"> • 1 (Qs 23, 24, 25) • 3 (Qs 25, 26, 27 – 36) • 4 (Q 37) • 6 (Qs 38 – 42) • 7 (Qs 43, 44) • 9 (Qs 45 – 53) • 11 (Q 24) <p>Please note: lessons 2, 5, 8, 10, and 12 are lessons where students apply what they have learned.</p>	<ul style="list-style-type: none"> • Know what makes a food healthy • Factors to consider when choosing makes a healthy snack • Identify healthy snacks • Know how to find the nutritional profile of different foods • Know what foods are part of the protein group • Be able to identify a meal that reflects all major food groups. • Food groups to consider when choosing a healthy meal • How much of different food groups to consume in a typical day for a healthful diet • Ways to make a recipe more healthful • Identify shopping strategies for shopping on a budget without compromising health • Know how to find and understand key features of food label • Calorie needs vary across people based on variety of factors 	<ul style="list-style-type: none"> • Understand that being physically active doesn't require athletic interest or skill or body type • Know the benefits of being physically active • Know recommended amount (time) of PA for teens • Understand that the same activity can vary in intensity • Identify PAs that reflect different levels of intensity, bone strengthening, muscle strengthening, aerobic
<p>Interest</p> <p>Nutrition Question: 6</p> <p>Physical Activity Question: 16</p>	<ul style="list-style-type: none"> • Interested in eating healthy food • Consider eating health food personally relevant • Want to learn more • Have family and/or peer group who supports healthy eating 	<ul style="list-style-type: none"> • Interested in getting regular physical activity • Consider physical activity personally relevant • Want to learn more • Have family or peers who support getting regular physical activity
<p>Self-efficacy</p> <p>Nutrition Questions: 9 – 10</p> <p>Physical Activity Questions: 19 – 20</p>	<ul style="list-style-type: none"> • Feel capable of eating balanced diet, overcoming barriers • Have the knowledge necessary to eat healthily • Have the capacity necessary 	<ul style="list-style-type: none"> • Feel capable of getting regular physical activity, overcoming barriers • Have the knowledge necessary to be physically active • Have the capacity necessary to

	<ul style="list-style-type: none"> to eat healthily • Plan to eat healthily 	<ul style="list-style-type: none"> be physically active. • Plan to eat physically active
<p>Intent</p> <p>Nutrition Questions: 62 – 63 and 65 Physical Activity Questions: 64 and 65</p> <p>Focus group content as well</p>	<ul style="list-style-type: none"> • Plan to choose healthier meals or snacks • Plan to use SuperTracker after completing the course • Plan to take what I learned and apply to my eating habits 	<ul style="list-style-type: none"> • Plan to get regular physical activity • Plan to use FitnessTracker after completing the course • Plan to take the lessons learned and apply it to physical activity
<p>Behavior</p> <p>Nutrition Questions: 54 – 58 Physical Activity Question: 59</p> <p>Focus group content as well</p>	<ul style="list-style-type: none"> • Currently eat a very healthy diet every day 	<ul style="list-style-type: none"> • Currently get physical activity at least 3 times per week
<p>Overall Assessment</p> <p>Program likes: Q60 Program improvements: Q61</p>	<ul style="list-style-type: none"> • Program likes (open-ended) • Program improvements (open-ended) 	<ul style="list-style-type: none"> • Program likes (open-ended) • Program improvements (open-ended)
Program Metrics – Focus Group Content Topics		
<p>Student Engagement</p>	<ul style="list-style-type: none"> • Interesting, fun, engaging content • Valuable • Easy to understand • Behavior change 	<ul style="list-style-type: none"> • Interesting, fun, engaging content • Valuable • Easy to understand • Behavior change
<p>Teachers and Staff: Toolkit & curriculum implementation</p>	<ul style="list-style-type: none"> • Interesting, fun, engaging, and encouraging for students (expectations in baseline, experience in follow-up) • Ease of implementation for teachers • Perceived value • Willingness to use package in future 	<ul style="list-style-type: none"> • Interesting, fun, engaging, and encouraging for students (expectations in baseline, experience in follow-up) • Ease of implementation for teachers • Perceived value • Willingness to use package in future
Observation Metrics – Focus Group Content Topics		
<p>Perceived Student Engagement</p>	<ul style="list-style-type: none"> • Interesting, fun, engaging, and encouraging for students • Perceived value • Students want to learn more • Students are excited about the curriculum • Students understand what is being asked of them • Students behavior is changing to mirror that of the curriculum 	<ul style="list-style-type: none"> • Interesting, fun, engaging, and encouraging for students • Perceived value • Students want to learn more • Students are excited about the curriculum • Students understand what is being asked of them • Students behavior is changing to mirror that of the curriculum